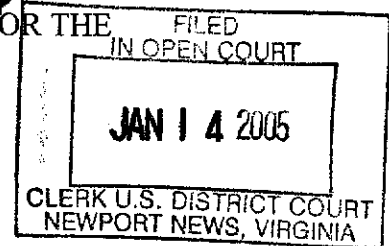


SEALED

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

NEWPORT NEWS DIVISION



UNITED STATES OF AMERICA

v.

JOE AGAPETO RODRIGUEZ

a/k/a "Ricardo Prendez Gonzalez"

(Counts 1, 2, 3, 4, 9, 15-18, 78, 84-85, 88-89,  
99-100, 102, 104-105, 121, 127, 137, 138, 163,  
181, 188, 189, 190, 192, 194, 202-203, 212-  
213, 243, 256-257, 259-260, 263 and 269)

TERENCE LAMAR JOHNSON

a/k/a "Ronald Stroud"

a/k/a "Kendoo"

(Counts 2 and 4)

ERIK LEROY MILLER

a/k/a "Dave A. Johnson"

a/k/a "David Jackson"

a/k/a "Hootie"

a/k/a "E"

(Counts 1-2, 4-6, 8-25, 29-30, 35-39, 46-48,  
66, 75, 79, 82-83, 93-95, 103, 106, 111-112,  
118, 122-125, 200, 207-211)

CHARLES MCDONALD VICKERY

a/k/a "Charlie"

a/k/a "Big Daddy"

(Counts 1-4, 44-45, 49-51, 55, 57-58, 60, 63,  
67, 70-74, 76-77, 80-81, 86-87, 90-92, 96-98,  
108-110, 114, 117, 119, 126, 128-154, 165-  
171, 173, 179, 212-213, 240, 242, 246, 249-  
250, 252, 264, 272, 282, 289, 295 and 300)

LISA LYNN BAIRD

(Counts 1 and 4)

) UNDER SEAL

) Criminal No: 4:05CR 9

) 21 U.S.C. § 846

) Conspiracy to Distribute and Possess  
) with Intent to Distribute Marijuana,  
) Cocaine and Cocaine Base  
) (Count 1)

) 21 U.S.C. § 848

) Operating a Continuing Criminal  
) Enterprise  
) (Count 2)

) 21 U.S.C. § 952

) Conspiracy to Import Marijuana and  
) Cocaine  
) (Count 3)

) 18 U.S.C. § 1956(h)

) Conspiracy to Launder Money  
) (Count 4)

) 18 U.S.C. § 1956 (a) (1) (A) (i), (a) (1)  
) (B) (i), (a) (1) (B) (ii), and 2

) Money Laundering to Promote and  
) Disguise Drug Trafficking  
) (Counts 5 - 182)

) 18 U.S.C. § 1957

) Money Laundering  
) (Counts 183 - 195)

) 31 U.S.C. § 5324 (a) (1)

) Structuring a Financial Transaction  
) (Count 196)

ROGER BENT	) 31 U.S.C. § 5324 (a) (3)
a/k/a "Jason Knight"	) Structuring a Financial Transaction
a/k/a "Bigs"	) (Counts 197 - 201)
(Counts 1 and 4)	)
JESUS CEBALLOS	) 21 U.S.C. § 841(a)(1) and (b) (1) (A) (B)
a/k/a "Chuy"	) (C) (D)
(Counts 1 and 3)	) Distribution of Marijuana, Cocaine and
	) Cocaine Base
	) (Counts 202 - 211)
ANGELA DENEEN CLARK	)
a/k/a "Angie"	) 21 U.S.C. § 841(a)(1) and (b) (1) (A) (B)
(Counts 1, 241, 248, 281, 320 and 322)	) (C) (D)
	) Possession with Intent to Distribute
ROBERT MACK DARR	) Marijuana, Cocaine and Cocaine Base
a/k/a "Bobby"	) (Counts 212 - 245)
(Counts 4 and 181)	)
	) 21 U.S.C. § 856(a)(1) and (2) and (b)
ROBERT JAMES DUNN, JR.	) Maintaining and Managing a Building for
a/k/a "Rob"	) Distributing Marijuana, Cocaine and
(Counts 1,4, 83, 94, 103, 113, 120, 210-211)	) Cocaine Base
	) (Counts 246 - 248)
GLORIA LYNN GREEN	)
(Count 4 and 196)	) 18 U.S.C. § 924 (c)(1)
	) Possession of a Firearm in Furtherance of
LATARSHA LANELLE GORE	) a Drug Trafficking Crime
a/k/a "Pinki"	) (Count 249)
(Counts 1, 223, 231-232, 274, 286, 291, 293	)
and 299)	) 18 U.S.C. § 922 (g)(1)
	) Possession of a Firearm by a Convicted
PAMELA YVETTE HOFFLER-RIDDICK	) Felon
(Counts 4, 40-43)	) (Count 250)
	)
LAMONIKA S. LAWRENCE	) 21 U.S.C. § 843 (b) and (d)
(Counts 4 and 14)	) Use of a Communication Facility
	) (Counts 251 - 324)
RICHARD BRYAN LESTER	)
a/k/a "Mark Shepard"	) 21 U.S.C. § 853
a/k/a "Kentucky"	) 18 U.S.C. § 982
(Counts 1, 3, 4 and 203)	) Criminal Forfeiture
	)
RICARDO OSCAR MANCHA	)
a/k/a "Rick"	)
(Counts 1, 3 and 4)	)
	)
	)
	)

BRIAN ONEIL MASON	)
a/k/a "Smurf"	)
(Counts 1, 271, 275, 278 and 283)	)
	)
JARICE DEVON MASON	)
a/k/a "Ja Ri"	)
(Counts 1, 224-225, 227-228, 230, 233, 235,	)
277, 287, 292, 298, 304, 306, 312-314 and	)
317)	)
	)
JOHN CECIL MCBRIDE	)
(Counts 1, 4, 26-28, 31-34, 40-43, 52-54, 56,	)
59, 61-62, 64-65, 68-69, 85, 88-89, 100-102,	)
104-105, 107, 155-162, 164, 183-193, 195,	)
197-199, 201 and 305)	)
	)
PABLO MAS OQUENDO	)
(Counts 4, 121, 127, 137, 148, 163, 173 and	)
194)	)
	)
SEAN DUNBAR QUARLES	)
a/k/a "Big Pun"	)
(Counts 1, 206, 217-219, 222, 226, 236, 251,	)
255, 258, 262, 268, 270, 279, 297 and 309)	)
	)
ELOISA RIOS QUINONES	)
a/k/a "Eloisa Vickery"	)
(Counts 1, 4, 44-45, 49, 50-51, 55, 58, 60, 63,	)
67, 70, 72-73, 77, 81, 86, 90-91, 96, 109-110,	)
114-115, 128, 131, 141, 147 and 215)	)
	)
LAZARO ALVARDO RAMIREZ, JR.	)
a/k/a "Agullero"	)
a/k/a "Oscar"	)
(Counts 1, 3-4, 78, 172, 174-178 )	)
	)
JAMES FRANK SMALLWOOD	)
a/k/a "Pops"	)
(Counts 1, 4, 26 -28,101, 107, 191, 193, 214,	)
273, 276, 284)	)
	)
DOROTHY JOHNSON SMITH	)
(Count 4)	)
	)
	)
	)

FREDA MARIE SMITH	)
(Counts 4-7, 10-13, 19, 21-25, 29-30, 35-36,	)
38-39, 46-48, 95, 106, 113, 116, 120, 122-125	)
and 200)	)
	)
JACQUELINE STANTON STEWART	)
a/k/a "Jackie"	)
(Counts 1, 4, 180, 182, 204-205, 247, 261, 267,	)
280 and 310)	)
	)
MARCUS EUGENE TAYLOR	)
(Counts 1, 238-239, 241, 242, 245, 248, 315,	)
318 and 321)	)
	)
KIET VAN TROUNG	)
(Counts 1, 220-221, 229, 234, 244, 253, 266,	)
288, 290, 301-302, 307, 316, 319, 323-324)	)
	)
CHARLES MCDONALD VICKERY, II	)
a/k/a "Chico"	)
(Counts 1, 4, 71, 87, 92, 115, 126, 130, 146,	)
149, 151, and 166,)	)
	)
TILLMON LAMONT WOODSON	)
(Counts 1, 216, 237, 254, 265, 285, 294, 296,	)
303, 308 and 311)	)
	)
Defendants.	)
	)
	)

# INDICTMENT

January 2005 Term – at Newport News, Virginia

## COUNT ONE

THE GRAND JURY CHARGES THAT:

From in or about September 1996, the exact date being unknown to the Grand Jury, and continuously thereafter up to and including the filing of this Indictment, in the Eastern District of Virginia and elsewhere, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez"

(hereinafter referred to as JOE RODRIGUEZ); ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E" (hereinafter referred to ERIK MILLER); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); LISA LYNN BAIRD (hereinafter referred to as LISA BAIRD); ROGER BENT, a/k/a "Jason Knight," a/k/a "Bigs" (hereinafter referred to as ROGER BENT); JESUS CEBALLOS, a/k/a "Chuy" (hereinafter referred to as JESUS CEBALLOS); ANGELA DENEEN CLARK, a/k/a "Angie" (hereinafter referred to as ANGELA CLARK); ROBERT JAMES DUNN, JR., a/k/a "Rob" (hereinafter referred to as ROBERT DUNN, JR.); LATARSHA LANELLE GORE, a/k/a "Pinki" (hereinafter referred to as LATARSHA GORE); RICHARD BRYAN LESTER, a/k/a "Mark Shepard," a/k/a "Kentucky" (hereinafter referred to as RICHARD LESTER); RICARDO OSCAR MANCHA, a/k/a "Rick" (hereinafter referred to as RICARDO MANCHA); BRIAN ONEIL MASON, a/k/a "Smurf" (hereinafter referred to as BRIAN MASON); JARICE DEVON MASON, a/k/a "Ja Ri" (hereinafter referred to as (JARICE MASON); JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE); SEAN DUNBAR QUARLES, a/k/a "Big Pun" (hereinafter referred to as SEAN QUARLES); ELOISA RIOS QUINONES, a/k/a "Eloisa Vickery" (hereinafter referred to as ELOISA QUINONES); LAZARO ALVARDO RAMIREZ, JR., a/k/a "Agullero," a/k/a "Oscar" (hereinafter referred to as LAZARO RAMIREZ, JR.); JAMES FRANK SMALLWOOD, a/k/a "Pops" (hereinafter referred to as JAMES SMALLWOOD); JACQUELINE STANTON STEWART, a/k/a "Jackie" (hereinafter referred to as (JACQUELINE STEWART); MARCUS EUGENE TAYLOR (hereinafter referred to as MARCUS TAYLOR); KIET VAN TROUNG (hereinafter referred to as KIET TROUNG); CHARLES MCDONALD VICKERY II, a/k/a "Chico" (hereinafter referred to as CHARLES

VICKERY, II); and TILLMON LAMONT WOODSON, the defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree with each other and with other persons, both known and unknown to the Grand Jury, to commit the following offenses against the United States of America:

1. Distribute one thousand (1000) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

2. Possess with the intent to distribute one thousand (1000) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

3. Distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine hydrochloride (hereinafter referred to as "cocaine"), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

4. Possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

5. Distribute five (5) grams or more of a mixture or substance containing a detectable amount of cocaine base, commonly known as "crack" (hereinafter referred to as cocaine base), a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

6. Possess with the intent to distribute five (5) grams or more of a mixture or substance containing a detectable amount of cocaine, commonly known as "crack", a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Section 841 (a) (1) and (b) (1) (A).

#### WAYS, MANNERS AND MEANS OF THE CONSPIRACY

The primary purpose of the conspiracy was to make money through the distribution of marijuana, cocaine, and cocaine base in the Cities of Hampton, Newport News, Norfolk, Virginia Beach, Portsmouth, Chesapeake, Suffolk, Richmond and in the county of York, all in the Commonwealth of Virginia (hereinafter referred to as "Hampton Roads"); in the City of Richmond and the counties of Chesterfield and Henrico, all in the Commonwealth of Virginia, within the Eastern District of Virginia; Atlanta, Georgia; Lexington, Kentucky; New Orleans, Louisiana; St. Louis, Missouri; Nashville, Tennessee; Dallas, Texas; Houston, Texas; and elsewhere. The ways, manners, and means by which the defendants and co-conspirators, carried out the purpose of the conspiracy include, but are not limited to, the following:

1. It was part of the conspiracy that defendants and co-conspirators, would and did play different roles in the conspiracy, take upon themselves different tasks and participate in the affairs of the conspiracy through various criminal acts. The defendants and co-conspirators would and did make themselves and their services available at various times throughout the conspiracy and would participate in selected marijuana, cocaine and cocaine base distribution ventures on an "as needed" basis. The roles assumed and carried out by the defendants and co-conspirators were interchangeable at various times throughout the conspiracy. These roles include, among others: financier, organizer, manager, supplier, broker, distributor, re-distributor, packager, transporter, courier of drugs and money, sender and receiver of Western Union wires,

sender and receiver of Federal Express and United States Post Office Express Mail packages containing United States currency (hereinafter referred to as "cash"), money launderer, provider of handguns, enforcer, and facilitator.

2. It was further part of the conspiracy that the defendants, co-conspirators and co-conspirators would and did procure marijuana, cocaine, and cocaine base, travel and caused others to travel in interstate and foreign commerce to facilitate the distribution of drugs, the payment and collection of monies related to drug transactions and the laundering of money.

3. It was further part of the conspiracy that the defendants and co-conspirators would and did on a consignment and cash basis obtain, distribute, and possess with the intent to distribute in excess of 10,000 pounds of marijuana, in excess of 300 kilograms of cocaine and 20 kilograms of cocaine base, commonly known as "crack", throughout the course of the conspiracy. On a regular basis, the marijuana and cocaine was provided by suppliers, transported by couriers and delivered to distributors for further re-distribution to other distributors in the Eastern District of Virginia and elsewhere.

4. It was further part of the conspiracy that the defendants and co-conspirators would and did derive substantial gross receipts from their illegal activities to finance the purchase, transportation, and distribution of marijuana, cocaine and cocaine base and related expenses as well as their personal living expenses.

5. It was further part of the conspiracy that the defendants and co-conspirators would and did use various methods to further the goals of the conspiracy and insure the conspiracy's continuing success. Some of these methods included the following: a) utilizing numerous co-conspirators to carry out the business of the conspiracy; b) renting and purchasing houses, apartments, condominiums, hotel rooms, and vehicles for the use of this illegal drug



trafficking organization; c) establishing fictitious businesses; d) using bank accounts, credit card accounts, airlines, telephones, overnight courier services, and wire services; e) retaining legal services to represent co-conspirators; e) and using threats of violence and possessing firearms.

6. It was a further part of the conspiracy that the defendants and co-conspirators did employ various methods during the transportation and delivery of drugs and drug proceeds to avoid detection by law enforcement agents and further the goals of the conspiracy. These methods included: a) traveling in two and three-car caravans using a follow vehicle; b) transporting marijuana and cocaine by varying their routes from Houston, Texas, to Hampton Roads and elsewhere; c) using cellular telephones to maintain communication between the vehicles; d) utilizing names of fictitious individuals and companies and mailing addresses to send and receive numerous packages containing cocaine and United States currency; e) packaging marijuana and cocaine in a compressed form, wrapping it in layers of plastic cellophane wrap and duct tape and placing the drugs in plastic containers; and f) secreting the marijuana, cocaine and United States currency in hidden compartments in automobiles, tractor and trailers.

7. It was further part of the conspiracy that the defendants and co-conspirators would and did utilize various methods to promote the marijuana, cocaine, and cocaine base trafficking and conceal and disguise the nature, location, source, ownership, or control of the drug proceeds by remitting money to their suppliers in order to continue to finance and facilitate the on-going illegal trafficking of marijuana and cocaine. These methods included: conducting transactions, financial and otherwise, involving in the aggregate large sums of money; for instance, transporting United States currency by courier in vehicles and on airplanes; the packaging of United States currency in packages using magazines to avoid detection by X-ray

scanners and shipping them via the United Post Office Express Mail; utilizing Western Union wire transfers; and by depositing cash into bank accounts and brokerage accounts and issuing checks, cashiers checks, cash payments all of which represented proceeds of marijuana, cocaine, and cocaine base trafficking in/from the Eastern District of Virginia and elsewhere, to be received by other defendants and co-conspirators in Houston, Texas, and elsewhere.

8. It was further part of the conspiracy that the defendants and co-conspirators did establish business entities with bank accounts including TPG, LLC, JCM FINANCIAL SERVICES and VICKERY CONSTRUCTION, which were used to receive monies, which represented proceeds of drug trafficking, to conduct financial transactions and disguise the illegal nature, source and ownership of the monies while giving the appearance that these illegal drug proceeds were legitimate business profits.

9. It was further part of the conspiracy that the defendants and co-conspirators would and did utilize various "stash" locations to receive, store, wrap, package, and distribute marijuana, cocaine, cocaine base, and drug proceeds and conduct the illegal affairs of the conspiracy, including:

- a. 78 Springdale Drive, Newport News, Virginia;
- b. 118 Scufflefield Road, Newport News, Virginia;
- c. 11201 Kingfisher Terrace, Chesterfield County, Virginia;
- d. 329 Center Street, Hampton, Virginia;
- e. 222 Syms Street, Hampton, Virginia;
- f. 502 Marshall Street, Hampton, Virginia;
- g. 5525 Germain Road, Richmond, Virginia;
- h. 3353 Meadowmont Lane, Henrico County, Virginia;

- i. 260-1208 Marcella Road, Hampton, Virginia;
- j. 646 W. Ocean View Avenue, Norfolk, Virginia;
- k. 642 W. Ocean View Avenue, Norfolk, Virginia;
- l. 1051 W. Ocean View Avenue, Norfolk, Virginia;
- m. 2430 Alabama, Avenue, Norfolk, Virginia;
- n. 115 Windy Point Drive, Suffolk, Virginia;
- o. 2228 Greenwood Drive, Portsmouth, Virginia;
- p. 5000 Burtwood Lane, Richmond, Virginia;
- q. 7407 Dell Drive, Chesterfield County, Virginia;
- r. Genito Mini Storage, 2501 Genito Place, unit #Q108, Chesterfield County,  
Virginia;
- s. Public Storage, 11885 Jefferson Avenue, unit #E180 & G249, Newport News,  
Virginia;
- t. 2805 Build America Drive, unit #34, Hampton, Virginia;
- u. Ample Storage, 4000 N. Bailey Bridge Road, unit #275, Chesterfield County,  
Virginia;
- v. Atlantic Self Storage, 2401 Build America Drive, unit #F-645 Hampton,  
Virginia;
- w. Mini-Price Self Storage, 801 J. Clyde Morris Boulevard, unit #9, Newport  
News, Virginia;
- x. Blue and Gray Self Storage, 6040 Walmsley Boulevard, unit #B25-96,  
Chesterfield County, Virginia;
- y. 12823 Carvel Lane, Houston, Texas;

- z. 12800 Woodforest Boulevard, Apartment #903, Houston, Texas;
- aa. 12800 Woodforest Boulevard, Apartment #1507, Houston, Texas;
- bb. 8206 Bonner Drive, Houston, Texas;
- cc. 6313 Sunnycrest Street, Houston, Texas; and

other residences and business establishments, within the Eastern District of Virginia and elsewhere.

10. It was further part of the conspiracy that the defendants and co-conspirators would recruit individuals from Hampton Roads; Atlanta, Georgia; Charlotte, North Carolina; Houston, Texas; and elsewhere to be employed as drug and money couriers; drug distributors; senders and receivers of United States Post Office Express Mail packages containing cocaine and cash; money launderers; senders and receivers of Western Union wire transfers; facilitators; and lessees of rental vehicles and hotel rooms in the Eastern District of Virginia and elsewhere.

11. It was further part of the conspiracy that the defendants and co-conspirators would and did use electronic pagers, long distance calling cards, landline telephones, cellular/PCS telephones, pre-paid cellular telephones, facsimile machines, and electronic mail, commonly referred to as "e-mail" to facilitate and further their marijuana and cocaine trafficking and money laundering activities. Some of these devices were obtained in nominee names and under aliases.

12. It was a further part of the conspiracy that the defendants and co-conspirators did communicate with each other the various names to be used to send and United States currency and for sending and receiving Western Union wire transfers.

13. It was further part of the conspiracy that the defendants and co-conspirators did use fictitious names and addresses of business entities on United States Postal Money Orders air

bill labels to disguise their illegal activities and avoid detection from law enforcement by giving the appearance that these packages containing drug proceeds were legitimate

14. It was further part of the conspiracy that after some of the co-conspirators were stopped by law enforcement agents in connection with their illegal activities relating to this conspiracy and/or became aware of law enforcement investigations into their illegal activities, other defendants and co-conspirators would and did change their method of operation to continue their controlled substances distribution activities and avoid detection by law enforcement agents. These changes in method of operation included changing telephone numbers, couriers and types of vehicles.

#### OVERT ACTS

In furtherance of the conspiracy, and to bring about the objects and goals of the conspiracy, the defendants and co-conspirators committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to the following:

1. On or about September 16, 1996, at 10018 Bissonnet Street, in Houston, Texas, ERIK MILLER and FREDA SMITH signed a lease for Southwest Barber Shop.
2. On or about September 16, 1996, in Houston, Texas, ERIK MILLER possessed approximately 5.1 grams of marijuana, \$4,363 in cash, and a 9mm semiautomatic pistol in a stolen 1997 Toyota Land Cruiser.
3. On or about September 26, 1996, at 6306-K Pewter Avenue, in Chesterfield County, Virginia, SEAN QUARLES possessed with intent to distribute approximately 810 grams of cocaine base, a quantity of marijuana, Tanita digital scales, two boxes of baking soda, plastic sandwich bags, \$556 in cash, and a Jennings model J-22 .22 caliber semi-automatic pistol.

4. On or about September 28, 1996, at 408 Laveta Drive, Richmond, Virginia, JARICE MASON and two co-conspirators possessed with intent to distribute 36 grams of cocaine, 11 grams of cocaine base, 9.38 ounces of marijuana, \$867 in cash, a stolen .380 caliber Bryco Model 48 pistol, a .40 caliber Sig Sauer P-229 pistol, a .45 caliber Sig Sauer P-220 pistol, a 9mm Intratec Tec-9 pistol, a 7.62 Norinco Mak-90 SKS rifle, a Smith and Wesson 9mm Model 969 pistol, a Remington .270 caliber rifle Model 7400, a Marlin .22 caliber rifle, and a Interarms .357 caliber/38 Special.

5. In or about October 1996, in Richmond, Virginia, Aaron Burton gave \$15,000 cash, which represented proceeds of drug trafficking, to a family member of SEAN QUARLES to hire a defense attorney.

6. In or about late 1996/early 1997, at Majik City, in Portsmouth, Virginia, TERENCE JOHNSON distributed approximately a quarter pound of marijuana to Cornell Smith.

7. In or about late 1996/early 1997, in Atlanta, Georgia, TERENCE JOHNSON made arrangements for Cornell Smith to travel via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia, to meet with TERENCE JOHNSON, ROGER BENT and a co-conspirator.

8. In or about late 1996/early 1997, TERENCE JOHNSON, ROGER BENT, Cornell Smith, and a co-conspirator traveled in a Nissan Maxima from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana.

9. In or about late 1996/early 1997, in Houston, Texas, ERIK MILLER and TERENCE JOHNSON obtained approximately 70 pounds of marijuana for transportation to and redistribution in Hampton Roads.

10. In or about late 1996/early 1997, in Houston, Texas, ERIK MILLER, TERENCE JOHNSON, ROGER BENT, LAMONIKA LAWRENCE, Cornell Smith, and a co-conspirator packaged approximately 70 pounds of marijuana into smaller bags for transportation to and redistribution in Hampton Roads.

11. In or about late 1996/early 1997, in Houston, Texas, TERENCE JOHNSON leased two rental vehicles to transport approximately 70 pounds of marijuana to Hampton Roads for redistribution.

12. In or about late 1996/early 1997, TERENCE JOHNSON, ROGER BENT, Cornell Smith, and a co-conspirator transported approximately 70 pounds of marijuana in two rental vehicles from Houston, Texas, to 78 Springdale Drive, Newport News, Virginia, for redistribution in Hampton Roads.

13. In or about late 1996/early 1997, at 78 Springdale Drive, in Newport News, Virginia, TERENCE JOHNSON paid Cornell Smith approximately \$1,000 in cash, which represented proceeds of drug trafficking, for transporting approximately 70 pounds of marijuana from Houston, Texas, to 78 Springdale Drive, Newport News, Virginia.

14. In or about 1997, in Richmond, Virginia, TILLMON WOODSON possessed with intent to distribute approximately one (1) kilogram of cocaine.

15. On or about January 8, 1997, at First National Bank Texas, in Houston, Texas, ERIK MILLER and Joslyn Tudor completed a signature card to open an account in the name of Southwest Barber Shop located at 10018 Bissonnet Street, Houston, Texas.

16. In or about early 1997, in Atlanta, Georgia, TERENCE JOHNSON made arrangements for Cornell Smith to travel via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia to meet with TERENCE JOHNSON and a co-conspirator.

17. In or about early 1997, in Atlanta, Georgia, TERENCE JOHNSON secreted a quantity of cash, which represented proceeds of drug trafficking, inside the cab of a tractor-trailer for transportation to Houston, Texas, to purchase a quantity of marijuana.

18. In or about early 1997, TERENCE JOHNSON directed Cornell Smith and a co-conspirator to transport a quantity of cash, in the cab of a tractor-trailer from Atlanta, Georgia, to Houston, Texas.

19. In or about early 1997, TERENCE JOHNSON flew from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana.

20. In or about early 1997, in Houston, Texas, ERIK MILLER and TERENCE JOHNSON picked up a quantity of cash, which represented proceeds of drug trafficking, from Cornell Smith and a co-conspirator in order to purchase a quantity of marijuana.

21. In or about early 1997, in Houston, Texas, ERIK MILLER and TERENCE JOHNSON directed Cornell Smith and a co-conspirator to transport approximately 100 pounds of marijuana in a tractor-trailer from Houston, Texas, to Hampton Roads.

22. In or about early 1997, Hampton Roads, Cornell Smith and a co-conspirator delivered approximately 100 pounds of marijuana to ERIK MILLER and TERENCE JOHNSON for redistribution.

23. In or about early 1997, in Hampton Roads, TERENCE JOHNSON paid Cornell Smith approximately \$3,000 in cash, which represented proceeds of drug trafficking, for transporting approximately 100 pounds of marijuana from Houston, Texas, to Hampton Roads.

24. In or about early 1997, in Atlanta, Georgia, TERENCE JOHNSON made arrangements for Cornell Smith to travel via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia, to meet with TERENCE JOHNSON and a co-conspirator.



25. In or about early 1997, in Atlanta, Georgia, TERENCE JOHNSON secreted a quantity of cash, which represented proceeds of drug trafficking, inside the cab of a tractor-trailer for transportation to Houston, Texas, to purchase a quantity of marijuana.

26. In or about early 1997, TERENCE JOHNSON directed Cornell Smith and a co-conspirator to transport a quantity of cash, in the cab of a tractor-trailer from Atlanta, Georgia, to Houston, Texas.

27. In or about early 1997, TERENCE JOHNSON flew from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana.

28. In or about early 1997, in Houston, Texas, ERIK MILLER and TERENCE JOHNSON picked up a quantity of cash, which represented proceeds of drug trafficking, from Cornell Smith and a co-conspirator in order to purchase a quantity of marijuana.

29. In or about early 1997, in Houston, Texas, ERIK MILLER and TERENCE JOHNSON directed Cornell Smith and a co-conspirator to transport approximately 200 pounds of marijuana in a tractor-trailer from Houston, Texas, to Hampton Roads.

30. In or about early 1997, Hampton Roads, Cornell Smith and a co-conspirator delivered approximately 200 pounds of marijuana to ERIK MILLER and TERENCE JOHNSON for redistribution.

31. In or about early 1997, in Hampton Roads, TERENCE JOHNSON paid Cornell Smith approximately \$3,000 in cash, which represented proceeds of drug trafficking, for transporting approximately 200 pounds of marijuana from Houston, Texas, to Hampton Roads.

32. In or about early 1997, in Atlanta, Georgia, TERENCE JOHNSON made arrangements for Cornell Smith to travel via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia, to meet with TERENCE JOHNSON and a co-conspirator.

33. In or about early 1997, in Atlanta, Georgia, TERENCE JOHNSON secreted a quantity of cash, which represented proceeds of drug trafficking, inside the cab of a tractor-trailer for transportation to Houston, Texas, to purchase a quantity of marijuana.

34. In or about early 1997, TERENCE JOHNSON directed Cornell Smith and a co-conspirator to transport a quantity of cash, in the cab of a tractor-trailer from Atlanta, Georgia, to Houston, Texas.

35. In or about early 1997, TERENCE JOHNSON flew from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana.

36. In or about early 1997, in Houston, Texas, ERIK MILLER and TERENCE JOHNSON picked up a quantity of cash, which represented proceeds of drug trafficking, from Cornell Smith and a co-conspirator in order to purchase a quantity of marijuana.

37. In or about early 1997, in Houston, Texas, ERIK MILLER and TERENCE JOHNSON directed Cornell Smith and a co-conspirator to transport approximately 200 pounds of marijuana in a tractor-trailer from Houston, Texas, to Hampton Roads.

38. In or about early 1997, in Hampton Roads, Cornell Smith and a co-conspirator delivered approximately 200 pounds of marijuana to ERIK MILLER and TERENCE JOHNSON for redistribution.

39. In or about early 1997, in Hampton Roads, TERENCE JOHNSON paid Cornell Smith approximately \$3,000 in cash, which represented proceeds of drug trafficking, for transporting approximately 200 pounds of marijuana from Houston, Texas, to Hampton Roads.

40. On or about March 13, 1997, at First National Bank of Texas, in Houston, Texas, ERIK MILLER and FRED A SMITH deposited or caused to be deposited \$4,355 in cash, which represented proceeds of drug trafficking.

41. On or about March 13, 1997, in Houston, Texas, ERIK MILLER distributed approximately 197 pounds of marijuana to a co-conspirator for transportation to the Eastern District of Virginia.

42. On or about March 13, 1997, in Houston, Texas, LAMONIKA LAWRENCE authorized Joslyn Tudor to use her 1996 Ford Probe to transport approximately 197 pounds of marijuana to the Eastern District of Virginia.

43. On or about March 14, 1997, in Rockbridge County, Virginia, Joslyn Tudor possessed with intent to distribute approximately 197 pounds of marijuana, a Davis .380 semi-automatic pistol along with six rounds of ammunition, two pagers, a cellular telephone, and \$360 in cash, which represented proceeds of drug trafficking.

44. On or about July 23, 1997, at Sterling McCall Toyota, in Houston, Texas, ERIK MILLER purchased a 1997 Toyota 4Runner by trading in a 1995 Toyota 4Runner, paying \$4,700 in cash, which represented proceeds of drug trafficking, and financing the balance of \$25,782.30 with Gulf States Acceptance Corporation of Memphis, Tennessee.

45. In or about October 1997, in Atlanta, Georgia, TERENCE JOHNSON asked Cornell Smith to transport a quantity of marijuana from Houston, Texas, to Hampton Roads in exchange for \$2,000 in cash, which represented proceeds of drug trafficking.

46. On or about October 16, 1997, in Carroll County, Georgia, TERENCE JOHNSON and a co-conspirator en route to Houston, Texas, traveling in a 1998 Mercedes Benz bearing Pennsylvania tags followed Cornell Smith and two co-conspirators in a 1995 Honda Odyssey mini-van bearing Virginia tags, who were transporting approximately \$33,000 in cash, which represented proceeds of drug trafficking.

47. In or about November 1997, in Newport News, Virginia, JOHN MCBRIDE agreed to become a financial advisor to Aaron Burton and assist him in the laundering of his cash, which represented proceeds of drug trafficking, through the purchase of real estate and a vehicle.

48. On or about November 12, 1997, Aaron Burton flew from Richmond, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine for redistribution in the Eastern District of Virginia.

49. On or about November 25, 1997, at First National Bank Texas, in Houston, Texas, ERIK MILLER deposited \$200 in cash, which represented proceeds of drug trafficking, into his account.

50. On or about November 25, 1997, at First National Bank Texas, in Houston, Texas, ERIK MILLER deposited \$8,000 in cash, which represented proceeds of drug trafficking, into his account.

51. On or about November 25, 1997, at First National Bank Texas, in Houston, Texas, ERIK MILLER deposited \$7,000 in cash, which represented proceeds of drug trafficking, into an account in the name of Southwest Barber Shop.

52. In or about 1998, in Richmond, Virginia, TILLMON WOODSON possessed with intent to distribute approximately one (1) kilogram of cocaine.

53. On or about January 2, 1998, in Houston, Texas, LAMONIKA LAWRENCE sent a \$400 Western Union wire transfer to a co-conspirator in Hampton, Virginia.

54. On or about January 9, 1998, in Newport News, Virginia, ROGER BENT sent a \$1,000 Western Union wire transfer to LAMONIKA LAWRENCE in Houston, Texas.

55. On or about January 9, 1998, in Newport News, Virginia, ROGER BENT sent a \$1,400 Western Union wire transfer to FREDIA SMITH in Houston, Texas.

56. On or about January 21, 1998, in Indianapolis, Indiana, LAMONIKA LAWRENCE received a \$500 Western Union wire transfer from Joslyn Tudor in Hampton, Virginia.

57. On or about January 29, 1998, at First National Bank, in Houston, Texas, ERIK MILLER deposited \$5,238, consisting of 23 Fidelity Express money orders, into an account in the name of Southwest Barber Shop.

58. On or about February 1, 1998, in Houston, Texas, ERIK MILLER received a \$700 Western Union wire transfer from a co-conspirator, under the alias name Larry Jones, in Hampton, Virginia.

59. On or about February 5, 1998, in Newport News, Virginia, ERIK MILLER sent an \$800 Western Union wire transfer to FREDIA SMITH in Houston, Texas.

60. On or about February 11, 1998, in Houston, Texas, ERIK MILLER sent a \$2,000 Western Union wire transfer to Gulf States Acceptance Corporation in Memphis, Tennessee, as a loan payment for a 1997 Toyota 4Runner.

61. On or about February 13, 1998, in Newport News, Virginia, ERIK MILLER sent a \$600 Western Union wire transfer to FREDIA SMITH in Houston, Texas.

62. On or about February 14, 1998, in Hampton, Virginia, ERIK MILLER sent a \$1,600 Western Union wire transfer to FREDIA SMITH in Houston, Texas.

63. On or about February 18, 1998, at Nick's Auto Supermarket, in Hampton, Virginia, TERENCE JOHNSON made a \$9,000 cash payment towards the purchase of a 1994 Mercedes Benz 600S.

64. On or about February 19, 1998, in Houston, Virginia, LAMONIKA LAWRENCE received a \$936 Western Union wire transfer from a co-conspirator in Hampton, Virginia, at the direction of TERENCE JOHNSON.

65. In or about February 1998, in the Eastern District of Virginia, JOHN MCBRIDE received \$8,000 in cash, which represented proceeds of drug trafficking, from Aaron Burton as the down payment for a red 1998 Chrysler Town and County van to be titled in the nominee name of PAMELA HOFFLER-RIDDICK.

66. On or about February 20, 1998, at Pomoco Chrysler Plymouth of Newport News, in Newport News, Virginia, JOHN MCBRIDE, purchased a red 1998 Chrysler Town and County van for \$34,556.05 and financed \$25,556.05 with Chrysler Financial Corporation in the nominee name of PAMELA HOFFLER-RIDDICK for Aaron Burton.

67. In or about February 1998, in the Eastern District of Virginia, JOHN MCBRIDE received approximately \$25,000 in cash, which represented proceeds of drug proceeds, from Aaron Burton to pay the balance of the loan that financed a red 1998 Chrysler Town and County van titled in the nominee name of PAMELA HOFFLER-RIDDICK.

68. On or about March 3, 1998, in Hampton, Virginia, ERIK MILLER sent a \$700 Western Union wire transfer to FREDA SMITH in Houston, Texas.

69. On or about March 4, 1998, at Consolidated Bank & Trust Company, in Hampton, Virginia, ROGER BENT and a co-conspirator each purchased \$9,000 cashier's checks for TERENCE JOHNSON to be used as a payment for the purchase of a 1994 Mercedes Benz 600S.

70. On or about March 4, 1998, at Nick's Auto Supermarket, in Hampton, Virginia, TERENCE JOHNSON directed a co-conspirator to make a \$9,000 cash payment towards the purchase of a 1994 Mercedes Benz 600S.

71. On or about March 5, 1998, at Consolidated Bank & Trust Company, in Newport News, Virginia, TERENCE JOHNSON directed a co-conspirator to purchase a \$9,000 cashier's check to be used as a payment for the purchase of a 1994 Mercedes Benz 600S.

72. On or about March 5, 1998, at Consolidated Bank & Trust Company, in Hampton, Virginia, TERENCE JOHNSON purchased a \$9,000 cashier's check to be used as a payment for the purchase of a 1994 Mercedes Benz 600S.

73. On or about March 5, 1998, at Nick's Auto Supermarket, in Hampton, Virginia, TERENCE JOHNSON made a \$15,100.94 cash payment towards the purchase of a 1994 Mercedes Benz 600S.

74. On or about March 5, 1998, in Houston, Texas, LAMONIKA LAWRENCE sent a \$2,500 Western Union wire transfer to a family member of Joslyn Tudor in St. Albans, New York.

75. On or about March 10, 1998, in Atlanta, Georgia, ERIK MILLER sent a \$450 Western Union wire transfer to FREDA SMITH in Houston, Texas.

76. On or about March 12, 1998, in Houston, Texas, LAMONIKA LAWRENCE sent a \$160 Western Union wire transfer to a co-conspirator, in Hampton, Virginia.

77. On or about March 14, 1998, in Atlanta, Georgia, ERIK MILLER received a \$2,000 Western Union wire transfer from a family member of a co-conspirator in Hampton, Virginia.

78. On or about March 27, 1998, in Fulton County, Georgia, ROGER BENT, under the alias name Jason Amos Knight, possessed less than one ounce of marijuana.

79. On or about April 2, 1998, in Houston, Texas, LAMONIKA LAWRENCE sent a \$2,500 Western Union wire transfer to a family member of Joslyn Tudor in Queens, New York.

80. On or about April 15, 1998, in Norcross, Georgia, TERENCE JOHNSON, under the alias name Ronald Stroud, sent a \$400 Western Union wire transfer to ERIK MILLER in Houston, Texas.

81. On or about April 24, 1998, in Houston, Texas, ERIK MILLER sent a \$700 Western Union wire transfer to Gulf States Acceptance Corporation in Memphis, Tennessee, as a loan payment for a 1997 Toyota 4Runner.

82. On or about April 29, 1998, in Houston, Texas, ERIK MILLER sent a \$1,500 Western Union wire transfer to ROGER BENT in Biloxi, Mississippi.

83. On or about April 30, 1998, at Genito Mini Storage, in Chesterfield County, Virginia, JOHN MCBRIDE leased unit #Q108 for \$144 per month for Aaron Burton to store marijuana, cocaine, and cash.

84. On or about May 19, 1998, in Newport News, Virginia, TERENCE JOHNSON caused a \$1,180 Western Union wire transfer to be sent to LAMONIKA LAWRENCE in Houston, Texas.

85. On or about June 7, 1998, in Houston, Texas, TERENCE JOHNSON, under the alias name Ronald Stroud, sent a \$100 Western Union wire transfer to a co-conspirator in Atlanta, Georgia.

86. On or about June 20, 1998, in Hampton, Virginia, ROGER BENT sent a \$900 Western Union wire transfer to ERIK MILLER in Houston, Texas.



87. On or about June 20, 1998, in Hampton, Virginia, TERENCE JOHNSON, under the alias name Ronald Stroud, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

88. On or about June 24, 1998, in Hampton, Virginia, TERENCE JOHNSON, under the alias name Ronald Stroud, sent a \$600 Western Union wire transfer to ERIK MILLER in Houston, Texas.

89. On or about July 2, 1998, in Newport News, Virginia, ROGER BENT sent a \$600 Western Union wire transfer to LAMONIKA LAWRENCE in Houston, Texas.

90. On or about July 8, 1998, at Nalley Lexus, in Marietta, Georgia, TERENCE JOHNSON purchased a 1998 Lexus LX470 for \$57,806.

91. On or about July 15, 1998, in Newport News, Virginia, ROGER BENT sent a \$930 Western Union wire transfer to ERIK MILLER in Houston, Texas.

92. On or about October 9, 1998, at the Virginia Department of Motor Vehicles in Newport News, Virginia, ROGER BENT attempted to obtain a Virginia driver's license in the name of Jason Amos Knight.

93. On or about November 7, 1998, Aaron Burton flew from Richmond, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine for redistribution in the Eastern District of Virginia.

94. On or about November 7, 1998, at Avis Rent a Car, in Houston, Texas, Aaron Burton leased a rental vehicle for two days.

95. On or about November 7, 1998, at the Sleep Inn, in Houston, Texas, Aaron Burton rented room #232 for two days.

96. In or about late 1998, in Houston, Texas, JOE RODRIGUEZ and LAZARO RAMIREZ, JR., distributed approximately 13 kilograms of cocaine to Aaron Burton.
97. On or about November 9, 1998, Aaron Burton traveled via Delta Airlines from Houston, Texas, to Richmond, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.
98. On or about November 17, 1998, in Atlanta Georgia, TERENCE JOHNSON, under the alias name Ronald Stroud, sent a \$450 Western Union wire transfer to a co-conspirator in Hampton, Virginia.
99. On or about November 20, 1998, in Lake City, Georgia, ROGER BENT sent a \$1,450 Western Union wire transfer to TERENCE JOHNSON in Houston, Texas.
100. On or about November 30, 1998, in Roswell, Georgia, ROGER BENT sent a \$950 Western Union wire transfer to LAMONIKA LAWRENCE in Houston, Texas.
101. On or about December 21, 1998, Aaron Burton flew from Richmond, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine for redistribution in the Eastern District of Virginia.
102. On or about December 23, 1998, Aaron Burton traveled via Delta Airlines from Houston, Texas, to Norfolk, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.
103. In or about 1999, in Richmond, Virginia, TILLMON WOODSON possessed with intent to distribute approximately one (1) kilogram of cocaine.
104. On or about January 1, 1999, Aaron Burton flew from Norfolk, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine for redistribution in the Eastern District of Virginia.

105. On or about January 3, 1999, Aaron Burton traveled from Houston, Texas, to Norfolk, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

106. On or about January 7, 1999, in Houston, Texas, TERENCE JOHNSON received a \$2,000 Western Union wire transfer from a co-conspirator in Hampton, Virginia.

107. On or about January 13, 1999, in Houston, Texas, TERENCE JOHNSON received a \$1,350 Western Union wire transfer from a co-conspirator in Hampton, Virginia.

108. On or about January 14, 1999, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE opened a Prime Share account.

109. In or about early 1999, at the Red Roof Inn, in Hampton, Virginia, ERIK MILLER agreed to distribute marijuana to David Espallat.

110. In or about early 1999, on Lamington Road, in Hampton, Virginia, ERIK MILLER distributed approximately 10 pounds of marijuana to David Espallat for further redistribution.

111. In or about early 1999, on Lamington Road, in Hampton, Virginia, ERIK MILLER distributed approximately 20 pounds of marijuana to David Espallat for further redistribution.

112. On or about February 7, 1999, in Houston, Texas, TERENCE JOHNSON directed a co-conspirator to receive a \$1,950 Western Union wire transfer sent from Hampton, Virginia.

113. On or about February 20, 1999, Aaron Burton flew from Richmond, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine for redistribution in the Eastern District of Virginia.

114. On or about February 20, 1999, at Avis Rent a Car, in Houston, Texas, Aaron Burton leased a rental vehicle for two days.

115. On or about February 22, 1999, Aaron Burton flew from Houston, Texas, to Richmond, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

116. On or about February 26, 1999, in Houston, Texas, TERENCE JOHNSON received a \$1,150 Western Union wire transfer from a co-conspirator in Hampton, Virginia.

117. On or about March 2, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Cadillac Deville bearing Georgia license plate XU770601.

118. On or about March 2, 1999, in Hampton, Virginia, TERENCE JOHNSON, under the alias name Ronald Stroud, sent a \$200 Western Union wire transfer to an individual in Queens, New York.

119. On or about March 4, 1999, in Portsmouth, Virginia, TERENCE JOHNSON directed Cornell Smith to send a \$500 Western Union wire transfer to a co-conspirator in Atlanta, Georgia.

120. On or about April 11, 1999, at National Car Rental, in Newport News, Virginia, TERENCE JOHNSON leased a Buick Regal bearing Virginia license plate BVC-0282.

121. In or about the spring of 1999, in Hampton Roads, TERENCE JOHNSON asked Lee Green to transport a quantity of marijuana from Houston, Texas, to Hampton Roads in exchange for \$3,000 in cash.

122. On or about April 27, 1999, Cornell Smith and Lee Green drove a tractor-trailer from Portsmouth, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for TERENCE JOHNSON and ERIK MILLER.

123. On or about April 29, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Regal bearing Texas license plate D33HHH.

124. On or about May 3, 1999, in Portsmouth, Virginia, TERENCE JOHNSON directed Cornell Smith to send a \$100 Western Union wire transfer to a co-conspirator in Riverdale, Georgia.

125. On or about May 6, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

126. On or about May 6, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Buick Regal bearing Georgia license plate 562PTL.

127. On or about May 7, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Century bearing Texas license plate D39WWZ.

128. On or about May 18, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

129. On or about May 19, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

130. In or about May 1999, in the Eastern District of Virginia, JOHN MCBRIDE received approximately \$38,000 in cash, which represented proceeds of drug trafficking, from Aaron Burton to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

131. On or about May 19, 1999, at First Union National Bank, in Hampton Roads, JOHN MCBRIDE purchased two official checks totaling \$11,900 with cash, which represented proceeds of drug trafficking, both payable to Williamsburg Title and Escrow, to be utilized as

part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

132. On or about May 20, 1999, at NationsBank, in Hampton Roads, PAMELA HOFFLER-RIDDICK directed an individual to purchase two official checks totaling \$10,000 with cash, which represented proceeds of drug trafficking, both payable to Williamsburg Title and Escrow, to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

133. On or about May 20, 1999, at First Union National Bank, in Newport News, Virginia, JOHN MCBRIDE purchased an official check in the amount of \$10,200 payable to Williamsburg Title and Escrow, with \$10,180 cash, which represented proceeds of drug trafficking, and wrote a \$20 personal check to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

134. On or about May 21, 1999, at First Union National Bank, in Norfolk, Virginia, JOHN MCBRIDE purchased an official check in the amount of \$2,000 with cash, which represented proceeds of drug trafficking, payable to Williamsburg Title and Escrow, to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

135. On or about May 21, 1999, at Bank of Hampton Roads, in Hampton Roads, JOHN MCBRIDE directed an attorney to purchase a cashier's check in the amount of \$3,900 with cash, which represented proceeds of drug trafficking, payable to Williamsburg Title and Escrow, to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

136. In or about the spring of 1999, in Newport News, Virginia, ROGER BENT and TERENCE JOHNSON purchased a green 1994 BMW 530I wagon for \$12,000 in cash, which represented proceeds of drug trafficking.

137. On or about May 24, 1999, at First Union National Bank, in Newport News, Virginia, JOHN MCBRIDE purchased an official check in the amount of \$24,100 payable to an attorney to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

138. On or about May 24, 1999, in Hampton Roads, PAMELA HOFFLER-RIDDICK directed an individual to purchase two NationsBank official checks totaling \$10,000, both payable to an attorney to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

139. On or about May 25, 1999, at the Bank of Hampton Roads, in Hampton Roads, JOHN MCBRIDE directed an attorney to purchase a cashier's check in the amount of \$38,000, payable to Williamsburg Title and Escrow, to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

140. On or about May 25, 1999, in Hampton Roads, JOHN MCBRIDE received a cashier's check in the amount of \$38,000, payable to Williamsburg Title and Escrow, from a Norfolk attorney to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

141. On or about May 25, 1999, in Hampton Roads, JOHN MCBRIDE delivered a cashier's check in the amount of \$38,000, payable to Williamsburg Title and Escrow, to Aaron Burton to be utilized as part of the down payment for the purchase of 329 Center Street, Hampton, Virginia, by Aaron Burton.

142. On or about May 25, 1999, at Williamsburg Title and Escrow, in Williamsburg, Virginia, Aaron Burton purchased 329 Center Street, Hampton, Virginia, for \$95,000.

143. On or about May 27, 1999, Aaron Burton traveled via US Air from Richmond, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine for redistribution in the Eastern District of Virginia.

144. On or about May 28, 1999, Aaron Burton traveled via US Air from Houston, Texas, to Norfolk, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

145. On or about May 29, 1999, ROGER BENT traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

146. On or about June 1, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

147. On or about June 14, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

148. On or about June 14, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Dodge Intrigue bearing Georgia license plate 1419795.

149. On or about June 19, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

150. On or about June 21, 1999, in Richmond, Virginia, JARICE MASON possessed a quantity of marijuana.



151. On or about June 23, 1999, ROGER BENT traveled via AirTran Airways from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

152. On or about June 25, 1999, in Hampton, Virginia, ROGER BENT sent a \$1,500 Western Union wire transfer to TERENCE JOHNSON in Queens, New York.

153. On or about July 1, 1999, ROGER BENT traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

154. On or about July 1, 1999, in Jasper, Texas, CHARLES VICKERY sent a \$400 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

155. On or about July 2, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

156. On or about July 3, 1999, ROGER BENT and TERENCE JOHNSON traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

157. On or about July 7, 1999, in Richmond, Virginia, KIET TRUONG possessed with intent to distribute a quantity of marijuana.

158. On or about July 10, 1999, at 4613 Demaree Court, in Henrico County, Virginia, JARICE MASON possessed a quantity of marijuana.

159. On or about July 20, 1999, Aaron Burton traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

160. On or about July 20, 1999, at Hertz Rent a Car, in Houston, Texas, Aaron Burton leased a Dodge Neon bearing Texas license plate D19RJD for one day.

161. On or about July 20, 1999, Aaron Burton traveled from Houston, Texas, to Richmond, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

162. On or about July 21, 1999, ROGER BENT traveled via AirTran Airways from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

163. On or about July 22, 1999, Cornell Smith and Lee Green drove a tractor-trailer from Portsmouth, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for TERENCE JOHNSON and ERIK MILLER.

164. On or about July 24, 1999, TERENCE JOHNSON and ERIK MILLER directed Cornell Smith and Lee Green to transport approximately 300 pounds of marijuana Houston, Texas, to Hampton Roads for redistribution.

165. On or about July 24, 1999, ROGER BENT traveled via Delta Airlines from Houston, Texas, to Atlanta, Georgia.

166. On or about July 24, 1999, TERENCE JOHNSON traveled via Delta Airlines from Houston, Texas, to Norfolk, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

167. On or about July 26, 1999, in Hampton Roads, TERENCE JOHNSON paid Cornell Smith approximately \$3,000 in cash, which represented proceeds of drug trafficking, for transporting approximately 300 pounds of marijuana from Houston, Texas, to Hampton Roads.

168. On or about August 2, 1999, in Jasper, Texas, CHARLES VICKERY sent a \$200 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

169. On or about August 5, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Chevrolet Impala bearing Georgia license plate Y9128229.

170. On or about August 7, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Regal bearing Texas license plate PP4771.

171. On or about August 11, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Dodge Intrepid bearing Florida license plate ED213K.

172. On or about August 11, 1999, at National Car Rental, in Newport News, Virginia, TERENCE JOHNSON leased a Buick Regal bearing Virginia license plate YXM-4251.

173. On or about August 11, 1999, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$500 Western Union wire transfer to a co-conspirator in McAllen, Texas.

174. On or about August 15, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Regal bearing Texas license plate PP4771.

175. On or about August 16, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Buick Regal bearing Georgia license plate 24200QA.

176. On or about August 18, 1999, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in McAllen, Texas.

177. On or about August 18, 1999, Aaron Burton traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine.

178. On or about August 18, 1999, Aaron Burton traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

179. On or about August 22, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Regal bearing Alabama license plate IDC5624.

180. On or about September 2, 1999, TERENCE JOHNSON traveled via Delta Airlines from Norfolk, Virginia, to Atlanta, Georgia.

181. On or about September 2, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Buick Century bearing Georgia license plate T2312355.

182. On or about September 4, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Century bearing Texas license plate F90CDK.

183. On or about September 6, 1999, in Hampton, Virginia, ERIK MILLER directed David Espaillat to send a \$3,900 Western Union wire transfer to a co-conspirator in Houston, Texas.

184. On or about September 9, 1999, at National Car Rental, in Newport News, Virginia, TERENCE JOHNSON leased an Oldsmobile Silhouette bearing Minnesota license plate CMW137.

185. On or about September 9, 1999, in Hampton, Virginia, ERIK MILLER directed David Espaillat to send a \$5,840 Western Union wire transfer to DOROTHY SMITH in Houston, Texas.

186. On or about September 10, 1999, at the Virginia Department of Motor Vehicles, in Richmond, Virginia, JOHN MCBRIDE facilitated Aaron Burton in obtaining a false Virginia driver's license in the name of JOHN MCBRIDE.

187. On or about September 11, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Cadillac Deville bearing Texas license plate D77GYN.

188. On or about September 14, 1999, in Jamaica, New York, ERIK MILLER obtained a false identification card in the name of Dave A. Johnson, 109-59 177<sup>th</sup> Street, Jamaica, New York with a date of birth of November 14, 1969.

189. On or about September 14, 1999, Aaron Burton traveled from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine.

190. On or about September 14, 1999, at National Car Rental, in Houston, Texas, Aaron Burton leased a Pontiac Sunfire bearing Texas license plate D49WJH for two days.

191. On or about September 14, 1999, at the Drury Inn, in Houston, Texas, Aaron Burton, under the alias name JOHN MCBRIDE, rented room #421 for two days.

192. On or about September 15, 1999, Aaron Burton traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

193. On or about September 16, 1999, in Houston, Texas, FRED A SMITH sent a \$200 Western Union wire transfer to LAMONIKA LAWRENCE in Indianapolis, Indiana.

194. On or about September 16, 1999, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in McAllen, Texas.

195. On or about September 17, 1999, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

196. On or about September 18, 1999, in Richmond, Virginia, Aaron Burton, under the alias name Quanta Long, sent a \$500 Western Union wire transfer to JOE RODRIGUEZ in Houston, Texas.

197. On or about September 23, 1999, in Hampton, Virginia, ERIK MILLER caused a co-conspirator to send a \$150 Western Union wire transfer to a co-conspirator in Landover, Maryland.

198. On or about September 25, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Regal bearing Texas license plate CO7PCJ.

199. On or about September 29, 1999, at Sprint PCS, in Hampton Roads, Keith Austin obtained cellular/PCS telephone service with telephone number (757) 593-5101 in his own name.

200. On or about September 29, 1999, Aaron Burton traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

201. On or about October 1, 1999, MARCUS TAYLOR traveled via AirTran from Houston, Texas, to Atlanta, Georgia.

202. In or about October 1999, at 329 Center Street, in Hampton, Virginia, JOE RODRIGUEZ stored approximately 2000 pounds of marijuana in a van parked at the residence.

203. On or about October 2, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Buick Regal bearing Texas license plate 4DVR095.

204. On or about October 6, 1999, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$750 Western Union wire transfer to FREDA SMITH in Houston, Texas.

205. On or about October 9, 1999, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$1,900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

206. On or about October 14, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Buick Regal bearing Georgia license plate 292PRC.

207. In or about October 1999, Cornell Smith and Lee Green drove a tractor-trailer from Portsmouth, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for TERENCE JOHNSON and ERIK MILLER.

208. On or about October 15, 1999, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Chevrolet Monte Carlo bearing Texas license plate G96CHJ.

209. On or about October 15, 1999, at the La Quinta Inn and Suites, in Houston, Texas, Lee Green rented room #150 for one day.

210. On or about October 15, 1999, at the Haynesville Correctional Center, in Richmond County, Virginia, LAMONIKA LAWRENCE deposited \$50, which represented proceeds of drug trafficking, into the canteen fund of Joslyn Tudor.

211. In or about October 1999, TERENCE JOHNSON and ERIK MILLER directed Cornell Smith and Lee Green to transport a quantity of marijuana from Houston, Texas, to Hampton Roads for redistribution.

212. On or about October 16, 1999, TERENCE JOHNSON traveled via Delta Airlines from Houston, Texas, to Norfolk, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

213. In or about early October 1999, in Norfolk, Virginia, TERENCE JOHNSON paid Lee Green approximately \$3,000 in cash, which represented proceeds of drug trafficking, for transporting a quantity of marijuana from Houston, Texas, to Hampton Roads.

214. On or about October 22, 1999, in Hampton, Virginia, ERIK MILLER caused a co-conspirator to send a \$200 Western Union wire transfer to ERIK MILLER, under the alias name David Johnson in Houston, Texas.

215. On or about October 22, 1999, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

216. On or about October 24, 1999, at National Car Rental, in Newport News, Virginia, TERENCE JOHNSON leased a Plymouth Grand Voyager bearing Virginia license plate YTW-7654.

217. On or about October 27, 1999, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

218. On or about October 29, 1999, at the Quality Inn and Suites, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #116 for one day.

219. On or about November 2, 1999, at National Car Rental, in Newport News, Virginia, TERENCE JOHNSON leased a Chevrolet Cavalier bearing South Carolina license plate 639HMF.

220. On or about November 2, 1999, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

221. On or about November 4, 1999, ERIK MILLER, under the alias name Dave Johnson, and a co-conspirator traveled via AirTran Airways from Houston, Texas, to Newport



News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

222. On or about November 7, 1999, at the Comfort Inn, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #338 for seven days.

223. On or about November 7, 1999, at approximately 6:18 p.m., in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$1,500 Western Union wire transfer to DOROTHY SMITH in Houston, Texas.

224. On or about November 7, 1999, at approximately 6:21 p.m., in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$1,500 Western Union wire transfer to FREDA SMITH in Houston, Texas.

225. On or about November 8, 1999, Aaron Burton traveled from Richmond, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of cocaine.

226. On or about November 8, 1999, at Avis Rent a Car, in Houston, Texas, Aaron Burton leased a Chevrolet Malibu bearing Texas license plate D63BHT for four days.

227. In or about early November 1999, Cornell Smith and Lee Green drove a tractor-trailer from Portsmouth, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for TERENCE JOHNSON and ERIK MILLER.

228. On or about November 9, 1999, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased an Oldsmobile Bravada bearing Georgia license plate 361REE.

229. On or about November 10, 1999, TERENCE JOHNSON traveled via Delta Airlines from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

230. On or about November 10, 1999, at the La Quinta Inn and Suites, in Houston, Texas, Lee Green rented room #227 for three days.

231. On or about November 11, 1999, Aaron Burton traveled from Houston, Texas, to Richmond, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

232. In or about early November 1999, TERENCE JOHNSON and ERIK MILLER directed Cornell Smith and Lee Green to transport a quantity of marijuana from Houston, Texas, to Hampton Roads for further redistribution to others.

233. On or about November 13, 1999, TERENCE JOHNSON traveled via Delta Airlines from Houston, Texas, to Atlanta, Georgia.

234. On or about November 15, 1999, at National Car Rental, in Newport News, Virginia, TERENCE JOHNSON leased a Dodge Intrigue bearing Virginia license plate YRV-3235.

235. In or about early November 1999, in Norfolk, Virginia, TERENCE JOHNSON paid Lee Green \$3,000 in cash, which represented proceeds of drug trafficking, for transporting a quantity of marijuana from Houston, Texas, to Hampton Roads.

236. On or about November 17, 1999, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented room #121 for 23 days.

237. On or about November 18, 1999, in Newport News, Virginia, JOE RODRIGUEZ sent a \$1,000 Western Union wire transfer to a co-conspirator in Houston, Texas.

238. On or about November 18, 1999, in Newport News, Virginia, JOE RODRIGUEZ sent a \$900 Western Union wire transfer to a co-conspirator in Houston, Texas.

239. On or about November 20, 1999, at the Comfort Inn Newport News, in Newport News, Virginia, JOE RODRIGUEZ rented room #320 for three days.

240. On or about November 25, 1999, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, with a co-conspirator to make arrangements to obtain a quantity of marijuana and cocaine.

241. On or about November 26, 1999, in Newport News, Virginia, JOE RODRIGUEZ sent a \$700 Western Union wire transfer to a co-conspirator in Houston, Texas.

242. In or about late 1999, in Portsmouth, Virginia, TERENCE JOHNSON asked Cornell Smith to transport marijuana from Houston, Texas, to Hampton Roads for redistribution in exchange for \$2,000 in cash, which represented proceeds of drug trafficking.

243. In or about late 1999, ROGER BENT and Cornell Smith transported a quantity of cash in a Buick LeSabre rental vehicle for TERENCE JOHNSON from Portsmouth, Virginia, to Houston, Texas, to pay for a quantity of marijuana for transportation to Hampton Roads.

244. On or about November 29, 1999, in Newport News, Virginia, JOE RODRIGUEZ sent an \$800 Western Union wire transfer to a co-conspirator in Houston, Texas.

245. On or about December 2, 1999, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

246. On or about December 6, 1999, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$999 Western Union wire transfer to FRED A SMITH in Houston, Texas.

247. On or about December 7, 1999, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented a second room, #218, for two days.

248. On or about December 7, 1999, in Newport News, Virginia, JOE RODRIGUEZ sent a \$4,000 Western Union wire transfer to a co-conspirator in Houston, Texas.

249. On or about December 7, 1999, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$999 Western Union wire transfer to DOROTHY SMITH in Houston, Texas.

250. On or about December 12, 1999, in Richmond, Virginia, Aaron Burton, under the alias name Joe Brown, sent a \$900 Western Union wire transfer to JOE RODRIGUEZ in Houston, Texas.

251. On or about December 15, 1999, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

252. On or about December 16, 1999, at approximately 3:31 p.m., in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to DOROTHY SMITH in Houston, Texas.

253. On or about December 16, 1999, at approximately 3:34 p.m., in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

254. On or about December 16, 1999, at approximately 4:15 p.m., in Newport News, Virginia, ERIK MILLER sent a \$900 Western Union wire transfer to DOROTHY SMITH in Houston, Texas.

255. On or about December 16, 1999, at approximately 4:21 p.m., in Newport News, Virginia, ERIK MILLER sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

256. On or about December 16, 1999, at approximately 5:26 p.m., in York County, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to a co-conspirator in Houston, Texas.

257. On or about December 16, 1999, at approximately 5:32 p.m., in York County, Virginia, TERENCE JOHNSON directed ERIK MILLER to send a \$500 Western Union wire transfer to a co-conspirator in Atlanta, Georgia.

258. On or about December 16, 1999, at approximately 5:58 p.m., in York County, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to a co-conspirator in Houston, Texas.

259. On or about December 16, 1999, at approximately 6:01 p.m., in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to a co-conspirator in Houston, Texas.

260. On or about December 17, 1999, in Newport News, Virginia, ERIK MILLER sent a \$900 Western Union wire transfer to FREDIA SMITH in Houston, Texas.

261. On or about December 19, 1999, in Houston, Texas, JOE RODRIGUEZ sent a \$100 Western Union wire transfer to a co-conspirator in Newport News, Virginia.

262. On or about December 20, 1999, in Houston, Virginia, FREDIA SMITH sent a \$500 Western Union wire transfer to LAMONIKA LAWRENCE in Indianapolis, Indiana.

263. On or about December 22, 1999, at Tidewater Nissan, in Newport News, Virginia, TERENCE JOHNSON purchased a 2000 Nissan Xterra for \$27,330 and made a \$8,540.73 cash down payment.

264. On or about December 24, 1999, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

265. On or about December 24, 1999, TERENCE JOHNSON traveled via Delta Airlines from Norfolk, Virginia, to Atlanta, Georgia.

266. On or about December 27, 1999, at the Haynesville Correctional Center, in Richmond County, Virginia, LAMONIKA LAWRENCE deposited \$75, which represented proceeds of drug trafficking, into the canteen fund of Joslyn Tudor.

267. On or about December 28, 1999, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

268. On or about December 30, 1999, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

269. On or about December 30, 1999, at 4123 Jefferson Davis Highway, in Richmond, Virginia, JARICE MASON possessed a quantity of marijuana.

270. On or about December 31, 1999, TERENCE JOHNSON traveled via Delta Airlines from Atlanta, Georgia, to Norfolk, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

271. In or about late 1999 or early 2000, at the parking lot of Newport Square, in Newport News, Virginia, ERIK MILLER distributed approximately 20 pounds of marijuana to David Espaillat and Ryan Hancock for further redistribution.

272. In or about 2000, in Richmond, Virginia, TILLMON WOODSON possessed with intent to distribute approximately one (1) kilogram of cocaine.

273. On or about January 1, 2000, in Hampton, Virginia, ANGELA CLARK signed an agreement to rent 329 Center Street, Hampton, Virginia, from Aaron Burton purportedly for \$1,000 per month.

274. On or about January 1, 2000, in Hampton, Virginia, MARCUS TAYLOR signed an agreement to rent 329 Center Street, Hampton, Virginia, from Aaron Burton purportedly for \$1,000 per month.

275. On or about January 10, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

276. On or about January 12, 2000, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented room #132 for 20 days.

277. On or about January 17, 2000, TERENCE JOHNSON made a \$9,100 payment on a loan for 1998 Lexus LX470 to Toyota Motor Acceptance Corporation, in East Elmhurst, New York.

278. On or about January 19, 2000, in Newport News, Virginia, JOE RODRIGUEZ sent a \$5,700 Western Union wire transfer to a co-conspirator in Houston, Texas.

279. On or about January 20, 2000, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

280. On or about January 20, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

281. On or about January 22, 2000, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

282. On or about January 24, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$100 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

283. On or about January 30, 2000, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Cadillac Deville bearing Texas license plate G18YMD.

284. In or about early 2000, at Harpoon Larry's Oyster Bar, in Hampton, Virginia, ERIK MILLER agreed to distribute marijuana to Ryan Hancock and provided him a toll-free pager number to facilitate contact between them.

285. On or about February 1, 2000, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented room #331 for 12 days.

286. On or about February 1, 2000, in Houston, Texas, FRED A SMITH sent a \$550 Western Union wire transfer to LAMONIKA LAWRENCE in Indianapolis, Indiana.

287. On or about February 1, 2000, at Sprint PCS, in Hampton Roads, Keith Austin obtained cellular/PCS telephone service with telephone number (757) 303-9044 in his own name.

288. On or about February 2, 2000, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Plymouth Grand Voyager bearing Georgia license plate 911GTE.

289. On or about February 4, 2000, at a Virginia Department of Motor Vehicles office in Hampton Roads, JOE RODRIGUEZ registered a 1987 Oldsmobile listing 12015 Jefferson Avenue, #331, Newport News, Virginia, the address of Suburban Lodge as his residence.

290. On or about February 7, 2000, at 329 Center Street, in Hampton, Virginia, MARCUS TAYLOR obtained telephone service from Verizon Virginia, Inc. with telephone number (757) 728-9336.

291. On or about February 12, 2000, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Chevrolet Blazer bearing Texas license plate 3DRY22.

292. On or about February 14, 2000, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, with



TERENCE JOHNSON to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

293. On or about February 14, 2000, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased an Oldsmobile Silhouette bearing Georgia license plate 392GMC.

294. On or about February 14, 2000, at National Car Rental, in Newport News, Virginia, TERENCE JOHNSON leased a GMC Jimmy bearing Virginia license plate YTW7495.

295. On or about February 14, 2000, in Hampton Roads, TERENCE JOHNSON asked Cornell Smith to transport a quantity of marijuana from Houston, Texas, to Hampton Roads and offered to him/her \$3,000 in cash, which represented proceeds of drug trafficking.

296. On or about February 15, 2000, at the Haynesville Correctional Center, in Richmond County, Virginia, ERIK MILLER and FRED A SMITH deposited or caused to be deposited \$200 into the canteen fund of Joslyn Tudor.

297. On or about February 17, 2000, Cornell Smith and Lee Green drove a tractor-trailer from Portsmouth, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for TERENCE JOHNSON and ERIK MILLER.

298. On or about February 17, 2000, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Buick Regal bearing Florida license plate IW129F.

299. On or about February 18, 2000, at the National Car Rental, in Houston, Texas, TERENCE JOHNSON leased an Oldsmobile Bravada bearing Texas license plate 3TZM63.

300. On or about February 18, 2000, at the La Quinta Inn and Suites, in Houston, Texas, Cornell Smith rented room #212 for two days.

301. On or about February 19, 2000, in Houston, Texas, ERIK MILLER, TERENCE JOHNSON, and Cornell Smith packaged approximately 315 pounds of marijuana into 10 to 15 pound packages for transportation to Hampton Roads for further redistribution to others.

302. On or about February 19, 2000, in Beaumont, Texas, Cornell Smith and Lee Green possessed approximately 315 pounds of marijuana in a tractor-trailer, which they were transporting to Hampton Roads for further redistribution.

303. On or about February 21, 2000, at the National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Buick Regal bearing Florida license plate IW369D.

304. On or about February 21, 2000, in Houston, Texas, FRED A SMITH received a \$1,600 Western Union wire transfer from a co-conspirator in Decatur, Georgia.

305. On or about February 28, 2000, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented room #228 for 23 days.

306. On or about February 28, 2000, in Houston, Texas, FRED A SMITH received a \$1,025 Western Union wire transfer from a family member of Ryan Hancock in Hampton, Virginia.

307. On or about February 28, 2000, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

308. On or about February 28, 2000, at the Courtyard by Marriott, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #335 for seven days.

309. In or about March of 2000, in Hampton, Virginia, JOE RODRIGUEZ stored approximately 60 kilograms of cocaine for distribution to Aaron Burton.

310. On or about March 2, 2000, at Public Storage, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented storage unit #E180 to store cocaine, marijuana and cash.

311. On or about March 2, 2000, at Public Storage, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, paid \$322.27 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #E180.

312. On or about March 3, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

313. On or about March 6, 2000, at the Radisson Hotel, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #917 for seven days.

314. On or about March 6, 2000, at the Virginia Department of Motor Vehicles, in Hampton Roads, JOE RODRIGUEZ obtained a Virginia driver's license with an address of 12015 Jefferson Avenue, #228, Newport News, Virginia, the address of the Suburban Lodge.

315. On or about March 6, 2000, at Public Storage, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, cancelled the lease for unit #E180 and leased a larger unit, #G249 to store cocaine, marijuana, and cash.

316. In or about March 2000, at the Radisson Hotel, in Hampton, Virginia, ERIK MILLER distributed approximately 10 pounds of marijuana to Ryan Hancock for further redistribution.

317. On or about March 7, 2000, at the National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Buick LeSabre bearing North Carolina license plate KSJ6243.

318. On or about March 7, 2000, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented a second room, #210 for eight days.

319. During the first week of March 2000, in Houston, Texas, TERENCE JOHNSON loaded a quantity of marijuana into the tractor-trailer of Ezzard Swint for transportation to Hampton Roads.

320. During the first week of March 2000, TERENCE JOHNSON directed Ezzard Swint to transport a quantity of marijuana in a tractor-trailer from Houston, Texas, to Hampton Roads for further redistribution to others.

321. On or about March 14, 2000, at National Car Rental, in Houston, Texas, TERENCE JOHNSON leased a Cadillac Deville bearing Texas license plate H65-GKT.

322. On or about March 18, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$100 Western Union wire transfer to a co-conspirator in Dodge City, Kansas.

323. On or about March 20, 2000, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

324. On or about March 20, 2000, in Houston, Texas, TERENCE JOHNSON directed Ezzard Swint to a location so that approximately 186 pounds of marijuana could be loaded in the tractor-trailer of a co-conspirator.

325. On or about March 20, 2000, in Houston, Texas, Ezzard Swint possessed approximately 186 pounds of marijuana in a tractor-trailer, which he was transporting to Hampton Roads for further redistribution to others.

326. On or about March 27, 2000, at National Car Rental, in Atlanta, Georgia, TERENCE JOHNSON leased a Chevrolet Impala bearing Georgia license plate 109GWA.

327. On or about March 27, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$175 Western Union wire transfer to a co-conspirator in Wichita, Kansas.

328. On or about March 29, 2000, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

329. In or about March or April 2000, at Harpoon Larry's Oyster Bar, in Hampton, Virginia, ERIK MILLER received approximately \$10,000 in cash, which represented proceeds of drug trafficking.

330. In or about April 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

331. On or about April 4, 2000, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone number (832) 721-3992.

332. On or about April 5, 2000, at the Department of Motor Vehicles, in Hampton Roads, JOE RODRIGUEZ changed the address on his Virginia driver's license to 12015 Jefferson Avenue, #331, Newport News, Virginia, the address of the Suburban Lodge.

333. On or about April 5, 2000, at the Haynesville Correctional Center, in Richmond County, Virginia, LAMONIKA LAWRENCE deposited \$25, which represented proceeds of drug trafficking, into the canteen fund Joslyn Tudor.

334. On or about April 6, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$300 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Hampton, Virginia.

335. On or about April 7, 2000, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented room #336, which was changed to room #240 for 33 days.

336. On or about April 14, 2000, in Houston, Texas, FRED A SMITH sent a \$500 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Newport News, Virginia.

337. On or about April 18, 2000, at Sprint PCS, in Houston, Texas, CHARLES VICKERY obtained cellular/PCS telephone service with telephone number (832) 563-6008 in a nominee name.

338. On or about April 19, 2000, at the Haynesville Correctional Center, in Richmond County, Virginia, LAMONIKA LAWRENCE deposited \$100, which represented proceeds of drug trafficking, into the canteen fund Joslyn Tudor.

339. On or about April 19, 2000, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ distributed approximately 50 pounds of marijuana to a co-conspirator.

340. On or about April 24, 2000, at Oyster Point Dodge, in Newport News, Virginia, JOE RODRIGUEZ purchased a 1985 Toyota pickup truck for \$2,813.17 in cash, which represented proceeds of drug trafficking.

341. On or about April 25, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

342. On or about April 26, 2000, at the StudioPLUS, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #120 for 12 days.

343. In or about May 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

344. On or about May 2, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

345. On or about May 7, 2000, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

346. On or about May 14, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

347. On or about May 16, 2000, at Haynesville Correctional Center, in Richmond County, Virginia, ERIK MILLER deposited or caused to be deposited \$200 into the canteen fund of Joslyn Tudor.

348. On or about May 17, 2000, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

349. On or about May 17, 2000, at the StudioPLUS in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #107 for 20 days.

350. On or about May 19, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$300 Western Union wire transfer to a co-conspirator, under the alias name David Angel in Destin, Florida.

351. On or about May 22, 2000, at the Suburban Lodge, in Newport News, Virginia, JOE RODRIGUEZ rented room #240 for 55 days.

352. On or about May 23, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$500 Western Union wire transfer to FREDA SMITH in Houston, Texas.

353. On or about May 23, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$200 Western Union wire transfer to a co-conspirator in Atlanta, Georgia.

354. On or about May 24, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$300 Western Union wire transfer to LAMONIKA LAWRENCE in Indianapolis, Indiana.

355. On or about May 26, 2000, LAMONIKA LAWRENCE traveled from Indianapolis, Indiana, with funds provided by ERIK MILLER, to Richmond County, Virginia, to visit Joslyn Tudor at the Haynesville Correctional Center.

356. On or about May 27, 2000, at the Haynesville Correctional Center, in Richmond County, Virginia, LAMONIKA LAWRENCE visited Joslyn Tudor.

357. On or about May 28, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$300 Western Union wire transfer to a co-conspirator, under the alias name David Angel in Panama City, Florida.

358. On or about May 28, 2000, at the Haynesville Correctional Center, in Richmond County, Virginia, LAMONIKA LAWRENCE visited Joslyn Tudor.

359. In or about June 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.



360. On or about June 2, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$500 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Newport News, Virginia.

361. On or about June 5, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

362. On or about June 6, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$300 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Newport News, Virginia.

363. On or about June 10, 2000, in Luling, Texas, LAZARO RAMIREZ, JR., sent a \$500 Western Union wire transfer to a co-conspirator in San Benito, Texas.

364. On or about June 11, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

365. On or about June 11, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$700 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Newport News, Virginia.

366. On or about June 13, 2000, at Sprint PCS, in Hampton Roads, Keith Austin obtained cellular/PCS telephone service with telephone number (757) 344-9017 in his own name.

367. On or about June 17, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$200 Western Union wire transfer to a co-conspirator in Talladega, Alabama.

368. On or about June 18, 2000, in Houston, Texas, JOE RODRIGUEZ sent a \$500 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Newport News, Virginia.

369. On or about June 20, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$300 Western Union wire transfer to FRED A SMITH in Houston, Texas.

370. On or about June 20, 2000, at Public Storage, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, paid \$198.33 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #G249.

371. On or about June 29, 2000, at the StudioPLUS, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #108 for 45 days.

372. On or about June 29, 2000, at nTelos, in Hampton Roads, MARCUS TAYLOR obtained cellular/PCS telephone service with telephone number (757) 715-9031 in his own name.

373. On or about June 30, 2000, at AT&T Wireless, in Houston, Texas, FRED A SMITH obtained cellular/PCS telephone service with telephone number (713) 294-5774 in her name for ERIK MILLER.

374. In or about the summer of 2000, at Harpoon Larry's Oyster Bar, in Hampton, Virginia, ERIK MILLER parked an Oldsmobile that contained approximately 150 pounds of marijuana and notified Ryan Hancock to retrieve the marijuana from the Oldsmobile for further redistribution.

375. In or about the summer of 2000, at the Cracker Barrel, in Newport News, ERIK MILLER asked Philip Furr to transport marijuana from Houston, Texas, to the Eastern District of Virginia.

376. On or about July 6, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

377. On or about July 11, 2000, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

378. On or about July 11, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

379. On or about July 13, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

380. On or about July 13, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$100 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

381. On or about July 23, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$700 Western Union wire transfer to FRED A SMITH in Houston, Texas.

382. On or about July 30, 2000, at 405 Fayette Avenue, in Henrico County, Virginia, JARICE MASON possessed with intent to distribute a quantity of cocaine base and \$1,037.83 in cash, which represented proceeds of drug trafficking.

383. In or about August 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

384. On or about August 2, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

385. On or about August 8, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

386. On or about August 12, 2000, at Triton PCS, in Hampton Roads, Keith Austin obtained cellular/PCS telephone service with telephone numbers (757) 675-9062 and (757) 472-4023 in his own name.

387. On or about August 12, 2000, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, with a co-conspirator to make arrangements to obtain a quantity of marijuana and cocaine.

388. On or about August 15, 2000, at the StudioPLUS, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #118 for 58 days.

389. On or about August 16, 2000, in Richmond, Virginia, JOHN MCBRIDE incorporated TPG, LLC in the Commonwealth of Virginia with the State Corporation Commission, to facilitate the laundering of cash, which represented proceeds of drug trafficking, for Aaron Burton, JAMES SMALLWOOD, and JOE RODRIGUEZ.

390. On or about August 16, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$9,600 in cash, which represented proceeds of drug trafficking, into his account for JAMES SMALLWOOD.

391. On or about August 16, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE and JAMES SMALLWOOD withdrew \$10,000 by a check payable to First Union Securities from an account in the name of JOHN MCBRIDE.

392. On or about August 17, 2000, at First Union Securities, in the Eastern District of Virginia, JOHN MCBRIDE and JAMES SMALLWOOD deposited \$10,000 to an account in the name of JAMES SMALLWOOD.

393. On or about August 22, 2000, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

394. On or about August 22, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to DOROTHY SMITH in Houston, Texas.

395. On or about August 22, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

396. On or about August 29, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

397. In or about August 2000, in the Eastern District of Virginia, JOHN MCBRIDE received approximately \$26,000 in cash, which represented proceeds of drug trafficking, from Aaron Burton to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.

398. On or about August 29, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$9,000 in cash, which represented proceeds of drug

trafficking, into his account to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.

399. On or about August 29, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

400. On or about August 29, 2000, at Haynesville Correctional Center, in Richmond County, Virginia, ERIK MILLER deposited or caused to be deposited \$200 into the canteen fund of Joslyn Tudor.

401. On or about August 30, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited in \$9,000 in cash, which represented proceeds of drug trafficking, into his account to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.

402. On or about August 31, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

403. On or about August 31, 2000, in the Eastern District of Virginia, Aaron Burton prepared a lease to rent 222 Syms Street, Hampton, Virginia, to JOE RODRIGUEZ from September 2, 2000, until September 30, 2001, purportedly for \$700 per month.

404. On or about August 31, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$8,000 in cash, which represented proceeds of drug trafficking, into his account to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.

405. On or about August 31, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE withdrew \$25,951.65 from his account by a check payable to Williamsburg Title and Escrow to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.

406. On or about August 31, 2000, in Hampton Roads, JOHN MCBRIDE delivered a check in the amount of \$25,951.65 payable to Williamsburg Title and Escrow to Aaron Burton to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.

407. On or about August 31, 2000, at Williamsburg Title and Escrow, in Williamsburg, Virginia, Aaron Burton purchased 222 Syms Street, Hampton, Virginia for \$69,900.

408. In or about September 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

409. On or about September 4, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$250 Western Union wire transfer to a co-conspirator in Mission, Texas.

410. On or about September 5, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FRED SMITH in Houston, Texas.

411. On or about September 8, 2000, in Hampton, Virginia, Aaron Burton obtained public utilities at 222 Syms Street in his name for JOE RODRIGUEZ with a billing address as 329-A Center Street, Hampton, Virginia, the residence of ANGELA CLARK and MARCUS TAYLOR.

412. On or about September 9, 2000, at Public Storage, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, paid \$170 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #G249.

413. On or about September 10, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

414. On or about September 11, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

415. On or about September 15, 2000, at the Studio PLUS, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #109 for five days.

416. On or about September 25, 2000, in Dallas, Texas, RICHARD LESTER and a co-conspirator possessed \$64,920 in cash, which represented proceeds of drug trafficking, in a 1998 Dodge pickup truck bearing Texas license plate 1ZG-G07.

417. On or about September 27, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$9,000 in cash, which represented proceeds of drug trafficking, into his account for the pay-off of a loan in the name of PAMELA HOFFLER-RIDDICK at Chrysler Financial Corporation for Aaron Burton's red 1998 Chrysler Town and Country van.

418. On or about September 27, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE withdrew \$9,000 from his account by check payable to Chrysler Financial Corporation for the pay-off of a loan in the name of PAMELA HOFFLER-



RIDDICK at Chrysler Financial Corporation for Aaron Burton's red 1998 Chrysler Town and Country van.

419. On or about September 28, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$7,650 in cash, which represented proceeds of drug trafficking, into his account for the pay-off of a loan in the name of PAMELA HOFFLER-RIDDICK at Chrysler Financial Corporation for Aaron Burton's red 1998 Chrysler Town and Country van.

420. On or about September 28, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE withdrew \$7,629.74 from his account by check payable to Chrysler Financial Corporation Union for the pay-off of loan in the name of PAMELA HOFFLER-RIDDICK at Chrysler Financial Corporation for Aaron Burton's red 1998 Chrysler Town and Country van.

421. On or about September 28, 2000, in the Eastern District of Virginia, JOHN MCBRIDE sent two Virginia Educators Credit Union checks payable to Chrysler Financial Corporation to pay-off a loan in the name of PAMELA HOFFLER-RIDDICK for Aaron Burton's red 1998 Chrysler Town and Country van.

422. On or about September 28, 2000, in the Eastern District of Virginia, JOHN MCBRIDE notified PAMELA HOFFLER-RIDDICK that the two Virginia Educators Credit Union checks totaling \$16,629.74 were transmitted to Chrysler Financial Corporation to pay-off a loan in her name for Aaron Burton's red 1998 Chrysler Town and Country van.

423. On or about September 28, 2000, in Hampton, Virginia, CHARLES VICKERY sent a \$950 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

424. In or about October 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

425. On or about October 5, 2000, in Houston, Texas, ELOISA QUINONES registered a 1987 Oldsmobile, previously owned by JOE RODRIGUEZ.

426. On or about October 6, 2000, in Newport News, Virginia, CHARLES VICKERY sent an \$800 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

427. On or about October 13, 2000, TERENCE JOHNSON made a \$5,000 payment on a loan for 1998 Lexus LX470 to Toyota Motor Acceptance Corporation, in Atlanta, Georgia,.

428. On or about October 13, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

429. On or about October 16, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

430. On or about October 16, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

431. On or about October 20, 2000, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$700 Western Union wire transfer to FREDA SMITH in Houston, Texas.

432. On or about October 30, 2000, at a Virginia Department of Motor Vehicles office, in Hampton Roads, CHARLES VICKERY obtained a Virginia driver's license with an address of 222 Syms Street, Hampton, Virginia, owned by Aaron Burton.

433. In or about late 2000, in Norfolk, Virginia, JAMES SMALLWOOD distributed approximately 20 kilograms of cocaine to JOHN MCBRIDE for Aaron Burton at a cost of \$30,000 per kilogram.

434. In or about November 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

435. In or about November 2000, in Hampton, Virginia, ROBERT DUNN, JR. obtained a 1995 Freightliner from a co-conspirator to transport marijuana from Houston, Texas, to the Eastern District of Virginia.

436. On or about November 1, 2000, in Newport News, Virginia, CHARLES VICKERY sent a \$300 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

437. On or about November 1, 2000, in Newport News, Virginia, ERIK MILLER, while driving a 1997 Toyota 4Runner, possessed approximately 3.2 grams of cocaine and approximately \$3,060 in cash, which represented proceeds of drug trafficking.

438. On or about November 1, 2000, FREDA SMITH traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia.

439. On or about November 1, 2000, at the Studio PLUS, in Newport News, Virginia, FREDA SMITH signed a note professing to be married to Dave Johnson, an alias name for ERIK MILLER.

440. On or about November 2, 2000, at The Township in Hampton Woods, in Hampton, Virginia, CHARLES VICKERY rented 260 Marcella Road, Apartment #1208, for \$549 per month.

441. On or about November 3, 2000, in Newport News, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

442. On or about November 4, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled on AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

443. On or about November 7, 2000, at the Microtel Inn of Newport News, in Newport News, Virginia, FREDA SMITH rented room #326 for four days.

444. On or about November 8, 2000, in Newport News, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

445. In or about November 2000, in the Eastern District of Virginia, JOHN MCBRIDE received approximately \$31,000 in cash, which represented proceeds of drug trafficking, from Aaron Burton to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

446. On or about November 8, 2000, in the District of Maryland, JOHN MCBRIDE purchased twenty-six (26) \$500 Western Union money orders to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

447. On or about November 8, 2000, at Harbor Bank, in Hampton Roads, JOHN MCBRIDE directed a co-conspirator to purchase a cashier's check in the amount of \$3,000 payable to TPG, LLC to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

448. On or about November 8, 2000, at Centura Bank, in Hampton Roads, JOHN MCBRIDE directed a co-conspirator to purchase an official check in the amount of \$2,500 payable to TPG, LLC to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

449. On or about November 9, 2000, at Peninsula Trust Bank, in Hampton Roads, JOHN MCBRIDE directed a co-conspirator to purchase a cashier's check in the amount of

\$2,500 payable to TPG, LLC to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

450. On or about November 9, 2000, at the MCT Federal Credit Union, in Montgomery County, Maryland, PAMELA HOFFLER-RIDDICK received \$7000 in cash, which represented proceeds of drug trafficking, from JOHN MCBRIDE and at JOHN MCBRIDE's direction deposited it into her account to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

451. On or about November 9, 2000, at the MCT Federal Credit Union, in Montgomery County, Maryland, PAMELA HOFFLER-RIDDICK, at the direction of JOHN MCBRIDE, withdrew \$7,000 from her account by check payable to TPG, LLC marked "loan" to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

452. On or about November 11, 2000, in Newport News, Virginia, CHARLES VICKERY sent an \$800 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

453. On or about November 13, 2000, at Centura Bank, in Hampton Roads, JOHN MCBRIDE directed a co-conspirator to purchase an official check in the amount of \$2,500 payable to TPG, LLC to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

454. On or about November 13, 2000, at Sprint PCS, in Richmond, Virginia, ROBERT DUNN, JR. obtained cellular/PCS telephone service with telephone number (804) 647-3237 in his own name.

455. On or about November 13, 2000, at AT&T Wireless, in Houston, Texas, FRED SMITH obtained cellular/PCS telephone service with telephone number (713) 449-8427 in her name for ERIK MILLER.

456. On or about November 13, 2000, in Houston, Texas, LAZARO RAMIREZ, JR., sent an \$800 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

457. On or about November 13, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

458. On or about November 14, 2000, at Pomoco Nissan of Hampton, in Hampton, Virginia, JOE RODRIGUEZ purchased a 1994 Chrysler LHS for \$7,145.47 in cash, which represented proceeds of drug trafficking.

459. On or about November 14, 2000, in Richmond, Virginia, ROBERT DUNN, JR. received a \$700 Western Union wire transfer from a co-conspirator in Hampton, Virginia.

460. On or about November 15, 2000, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

461. On or about November 16, 2000, in Newport News, Virginia, CHARLES VICKERY, d/b/a Vickery Construction, signed a lease with Powell and Associates Realty, Inc., for the lease of storage unit #34 at 2805 Build America Drive, Hampton, Virginia, for \$800 per month to store cocaine, marijuana and cash.

462. On or about November 16, 2000, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$1,600 in cash, which represented proceeds

of drug trafficking, to lease including a security deposit storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

463. On or about November 17, 2000, in Chesapeake, Virginia, JAMES SMALLWOOD purchased 115 Windy Point Drive, Suffolk, Virginia, for \$280,000.

464. On or about November 17, 2000, in Newport News, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

465. On or about November 17, 2000, at First Union National Bank, in Hampton Roads, JOHN MCBRIDE purchased an official check in the amount of \$8,500 payable to TPG, LLC to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

466. On or about November 17, 2000, in Hampton Roads, JOE RODRIGUEZ changed the address on his Virginia driver's license to 222 Syms Street, Hampton, Virginia, owned by Aaron Burton.

467. On or about November 20, 2000, in Hampton, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

468. In or about November 2000, in the Eastern District of Virginia, JOHN MCBRIDE received approximately \$38,500 in cash, which represented proceeds of drug trafficking, from Aaron Burton to be utilized as part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.

469. On or about November 20, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$30,000 in cash, which represented proceeds of drug trafficking, into his account in the presence of GLORIA GREEN to be utilized

as part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.

470. On or about November 20, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, GLORIA GREEN instructed teller #317 not to prepare a currency transaction report as required by federal law for the \$30,000 cash deposit made by JOHN MCBRIDE.

471. On or about November 20, 2000, at First Union National Bank, in the Eastern District of Virginia, JOHN MCBRIDE opened an account in the name of TPG, LLC to launder cash, which represented proceeds of drug trafficking, for Aaron Burton, JAMES SMALLWOOD and JOE RODRIGUEZ.

472. On or about November 21, 2000, First Union National Bank, in Norfolk, Virginia, JOHN MCBRIDE deposited \$39,000 into an account in the name of TPG, LLC consisting of cashier's checks, official checks and Western Union money orders to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

473. On or about November 21, 2000, in Newport News, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

474. On or about November 21, 2000, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

475. On or about November 22, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$8,500 in cash, which represented



proceeds of drug trafficking, into his account to be utilized as part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.

476. On or about November 22, 2000, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE withdrew \$38,459.65 from his account by a check payable to Williamsburg Title and Escrow to be utilized as part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.

477. On or about November 22, 2000, in Hampton Roads, JOHN MCBRIDE delivered a check in the amount of \$38,459.65 payable to Williamsburg Title and Escrow to Aaron Burton to be utilized as part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.

478. On or about November 22, 2000, at Williamsburg Title and Escrow, in Williamsburg, Virginia, Aaron Burton purchased 502 Marshall Street, Hampton, Virginia for \$162,500.

479. On or about November 25, 2000, in Houston, Texas, ERIK MILLER, under the alias name Dave Johnson, received a \$900 Western Union wire transfer from Brian Sherwood from Hampton, Virginia.

480. On or about November 25, 2000, in Hampton, Virginia, CHARLES VICKERY sent a \$600 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

481. On or about November 25, 2000, in Hampton, Virginia, JOE RODRIGUEZ sent a \$500 Western Union wire transfer to a co-conspirator in Houston, Texas.

482. On or about November 27, 2000, in Houston, Texas, FRED SMITH received a \$925 Western Union wire transfer from a co-conspirator in Norfolk, Virginia.

483. On or about November 27, 2000, at First Union National Bank, in Hampton Roads, JOHN MCBRIDE withdrew \$30,570.10 from an account in the name of TPG, LLC by counter check payable to First Union National Bank to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

484. On or about November 27, 2000, at First Union National Bank, in Hampton Roads, JOHN MCBRIDE purchased an official check in the amount of \$30,570.10 payable to Williamsburg Title and Escrow to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

485. On or about November 27, 2000, in Hampton Roads, JOHN MCBRIDE delivered an official check in the amount of \$30,570.10 payable to Williamsburg Title and Escrow to Aaron Burton to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.

486. On or about November 27, 2000, at Williamsburg Title and Escrow, in Williamsburg, Virginia, Aaron Burton purchased 323 E. Pembroke Avenue, Hampton, Virginia for \$114,900.

487. On or about November 30, 2000, in Hampton, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

488. In or about December 2000, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

489. On or about December 3, 2000, in Hampton, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to CHARLES VICKERY, II in Houston, Texas.

490. On or about December 3, 2000, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone numbers (832) 368-4618 and (832) 428-6650.

491. On or about December 3, 2000, TERENCE JOHNSON, under the alias name Ronald Stroud, traveled via AirTran Airways from Atlanta, Georgia, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

492. On or about December 5, 2000, in Hampton, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

493. On or about December 7, 2000, in Newport News, Virginia, CHARLES VICKERY sent a \$950 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

494. On or about December 7, 2000, in Houston, Texas, FREDA SMITH falsely represented employment with Spectrum Finance Group and claimed year-to-date earnings in 2000 of \$56,498.16 and earnings of \$56,992.38 and \$58,973.46 for 1998 and 1999, respectively, in order to apply for a mortgage loan Chapel Funding Corporation also doing business as Chapel Mortgage Corporation.

495. On or about December 8, 2000, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

496. On or about December 9, 2000, in Houston, Texas, FREDA SMITH claimed a false verification of deposit of a Washington Mutual Bank account in the name of FREDA SMITH for a mortgage loan application with Chapel Funding Corporation.

497. On or about December 10, 2000, at Public Storage, in Newport News, Virginia, a co-conspirator paid \$170 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #G249 for ERIK MILLER, under the alias name Dave Johnson.

498. On or about December 11, 2000, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

499. On or about December 11, 2000, ERIK MILLER, under the alias name Dave Johnson, and a co-conspirator traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

500. On or about December 11, 2000, at the Quality Inn and Suites, in Hampton, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #131 for 13 days.

501. On or about December 14, 2000, in Newport News, Virginia, CHARLES VICKERY paid Powell & Associates Realty, Inc., \$400 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

502. On or about December 20, 2000, in Houston, Texas, FREDA SMITH altered two Washington Mutual Bank statements that were to be filed with a mortgage loan application with Chapel Funding Corporation.

503. On or about December 22, 2000, at Bank of America, in Houston, Texas, FREDA SMITH and a co-conspirator purchased a cashier's check for \$18,569 payable to Fidelity National Title Company by paying \$13,500 in cash, which represented proceeds of drug

trafficking, and by withdrawing \$5,069 from an account in the name of a co-conspirator, to be utilized as the down payment for the purchase of 12823 Carvel Lane, Houston, Texas.

504. On or about December 22, 2000, at Fidelity National Insurance Company, in Houston, Texas, FREDA SMITH presented a cashier's check to be utilized as the down payment for the purchase of 12823 Carvel Lane, Houston, Texas.

505. On or about December 22, 2000, at Sprint PCS, in Hampton Roads, TILLMON WOODSON obtained cellular/PCS telephone service with telephone number (757) 581-2833 in his own name, with a billing address of 1916 Rose Avenue, Richmond, Virginia.

506. On or about December 23, 2000, in Houston, Texas, ERIK MILLER, under the alias name Dave Johnson, sent a \$500 Western Union wire transfer to a co-conspirator in Hampton, Virginia.

507. On or about December 29, 2000, CHARLES VICKERY traveled via from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

508. On or about December 31, 2000, in Houston, Texas, ERIK MILLER, under the alias name Dave Johnson, sent a \$200 Western Union wire transfer to LAMONIKA LAWRENCE in Indianapolis, Indiana.

509. On or about December 31, 2000, CHARLES VICKERY traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

510. In or about 2001, in Richmond, Virginia, TILLMON WOODSON possessed with intent to distribute approximately one (1) kilogram of cocaine.

511. In or about January 2001, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

512. On or about January 1, 2001, in Newport News, Virginia, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

513. On or about January 3, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

514. On or about January 3, 2001, at the Quality Inn and Suites, in Hampton, Virginia, ERIK MILLER, under the alias name David Jackson, rented room #118 for seven days.

515. On or about January 8, 2001, at the Quality Inn and Suites, in Hampton, Virginia, ERIK MILLER, under the alias name David Johnson, rented room #120 for one day.

516. On or about January 10, 2001, at Sprint PCS, in Houston, Texas, LAZARO RAMIREZ, JR., obtained cellular/PCS telephone service with telephone number (832) 651-5287 in his own name.

517. On or about January 13, 2001, in Hampton, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

518. On or about January 17, 2001, in Hampton, Virginia, JOE RODRIGUEZ sent a \$500 Western Union wire transfer to a family member of LAZARO RAMIREZ, JR., in Houston, Texas.

519. On or about January 19, 2001, in Norfolk, Virginia, CHARLES VICKERY signed a rental agreement with an individual to lease 646 W. Ocean View Avenue, Norfolk, Virginia.

520. On or about January 19, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual a security deposit of \$950 in cash, which represented proceeds of drug trafficking, for the rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

521. On or about January 23, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

522. On or about January 27, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

523. On or about January 27, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

524. On or about January 28, 2001, at Public Storage, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, paid \$85 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #G249.

525. On or about January 29, 2001, CHARLES VICKERY traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

526. On or about January 30, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the February 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

527. On or about January 31, 2001, in Norfolk, Virginia, CHARLES VICKERY obtained public utilities (water) in his name at 646 W. Ocean View Avenue.

528. On or about January 31, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

529. On or about January 31, 2001, CHARLES VICKERY traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

530. In or about February 2001, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

531. On or about February 1, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

532. On or about February 2, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

533. On or about February 5, 2001, in Hampton, Virginia, CHARLES VICKERY rented P. O. Box 7541, Hampton, Virginia.



534. On or about February 6, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

535. On or about February 7, 2001, at the Omni Hotel, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #114 for eight days.

536. On or about February 9, 2001, in Hampton, Virginia, CHARLES VICKERY sent a \$300 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

537. On or about February 12, 2001, at Public Storage, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, paid \$85 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #G249.

538. On or about February 14, 2001, in Houston, Texas, ERIK MILLER, under the alias name Dave Johnson, sent a \$1,000 Western Union wire transfer to ROBERT DUNN, JR. in Richmond, Virginia.

539. On or about February 13, 2001, at Pomoco Nissan of Hampton, in Hampton, Virginia, JOE RODRIGUEZ made a \$5,000 deposit in cash, which represented proceeds of drug trafficking, on a 1995 Chevrolet Corvette.

540. On or about February 14, 2001, at Pomoco Nissan of Hampton, in Hampton, Virginia, JOE RODRIGUEZ purchased a 1995 Chevrolet Corvette for \$21,232.75 by signing a promissory note for \$16,232.75 and applying the \$5,000 deposit to the purchase price.

541. On or about February 14, 2001, in Hampton Roads, Aaron Burton facilitated a phone meeting between JOE RODRIGUEZ and JOHN MCBRIDE for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.

542. On or about February 14, 2001, at First Union National Bank, in Newport News, Virginia, JOHN MCBRIDE deposited \$16,233 in cash, which represented proceeds of drug trafficking, into an account in the name of TPG, LLC for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.

543. On or about February 15, 2001, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE obtained a loan in the amount of \$16,232.75 approved by GLORIA GREEN for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.

544. On or about February 16, 2001, at Pomoco Nissan of Hampton, in Hampton, Virginia, JOE RODRIGUEZ paid a promissory note by paying \$16,232.75 by check, which represented the proceeds of a loan in the name of JOHN MCBRIDE and approved by GLORIA GREEN at the Virginia Educators Credit Union.

545. On or about February 16, 2001, in Hampton, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

546. On or about February 16, 2001, in Hampton, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to CHARLES VICKERY, II, in Houston, Texas.

547. On or about February 21, 2001, at the Haynesville Correctional Center, in Richmond County, Virginia, ERIK MILLER deposited or caused to be deposited \$200 into the canteen fund of Joslyn Tudor.

548. On or about February 21, 2001, at First Union National Bank, in Newport News, Virginia, JOHN MCBRIDE withdrew \$16,262.77 from an account in the name of TPG, LLC by a check payable to the Virginia Educators Credit Union for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.

549. On or about February 21, 2001, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE paid \$16,262.77 on a loan in the name of JOHN MCBRIDE for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.

550. On or about February 22, 2001, in Hampton, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

551. On or about February 28, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the March 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

552. In or about March 2001, in Hampton Roads, JAMES SMALLWOOD gave JOHN MCBRIDE approximately \$215,000 in cash, which represented proceeds of drug trafficking, with the agreement that JOHN MCBRIDE was to make annual payments of approximately \$30,000 to \$35,000 to JAMES SMALLWOOD.

553. In or about March 2001, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

554. On or about March 1, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$925 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

555. On or about March 1, 2001, in Newport News, Virginia, CHARLES VICKERY sent a \$925 Western Union wire transfer to CHARLES VICKERY, II in Houston, Texas.

556. On or about March 2, 2001, in Houston, Texas, ERIK MILLER sent a \$900 Western Union wire transfer to a co-conspirator in Hampton, Virginia.

557. On or about March 2, 2001, in Houston, Texas, ERIK MILLER sent a \$200 Western Union wire transfer to ROBERT DUNN, JR. in Richmond, Virginia.

558. On or about March 2, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

559. On or about March 5, 2001, in Norfolk, Virginia, PAMELA HOFFLER-RIDDICK, as a nominee for Aaron Burton, signed a bill of sale transferring ownership of a red 1998 Chrysler Town and County van as of February 10, 2001, for \$500 to ANGELA CLARK as a nominee for Aaron Burton.

560. On or about March 5, 2001, at the Virginia Department of Motor Vehicles, in Norfolk, Virginia, ANGELA CLARK registered a red 1998 Chrysler Town and County van.

561. On or about March 5, 2001, CHARLES VICKERY traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

562. On or about March 5, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

563. On or about March 6, 2001, at the Hampton Inn, in Newport News, Virginia, ERIK MILLER rented room #514 for four days.

564. On or about March 9, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

565. On or about March 9, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

566. On or about March 13, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

567. On or about March 14, 2001, at the Hampton Inn, in Newport News, Virginia, ERIK MILLER rented room #507 for four days.

568. On or about March 15, 2001, in Newport News, Virginia, ERIK MILLER sent a \$900 Western Union wire transfer to FRED A SMITH in Houston, Texas.

569. On or about March 16, 2001, CHARLES VICKERY traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

570. On or about March 17, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

571. On or about March 24, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

572. On or about March 24, 2001, Keith Austin and Ryan Hancock traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, with approximately \$15,000 in cash, which represented proceeds of drug trafficking, to arrange to obtain a quantity of marijuana from ERIK MILLER.

573. On or about March 24, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the April 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

574. On or about March 25, 2001, Keith Austin and Ryan Hancock traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

575. On or about March 25, 2001, in Hampton, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

576. On or about March 26, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

577. On or about March 26, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

578. On or about March 26, 2001, at the Hampton Inn, in Newport News, Virginia, ERIK MILLER rented room #407 for one day.

579. On or about March 26, 2001, in Richmond, Virginia, ROBERT DUNN, JR., distributed approximately 80 pounds of marijuana, at the direction of ERIK MILLER, to Ryan Hancock for further redistribution in Hampton Roads.

580. On or about March 27, 2001, at the Hampton Inn, in Newport News, Virginia, ERIK MILLER rented room #507 for four days.

581. On or about March 28, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

582. On or about March 30, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

583. On or about March 30, 2001, at Pomoco Nissan of Hampton, in Hampton, Virginia, JOE RODRIGUEZ purchased a 1998 Ford Expedition for \$24,741.55 by signing a promissory note for \$24,741.55 and paying \$9,000 in cash, which represented proceeds of drug trafficking.

584. On or about March 31, 2001, CHARLES VICKERY traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

585. On or about April 1, 2001, CHARLES VICKERY traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

586. On or about April 3, 2001, in Norfolk, Virginia, JOE RODRIGUEZ sent a \$300 Western Union wire transfer to a co-conspirator in Houston, Texas.

587. On or about April 3, 2001, in Hampton Roads, JOE RODRIGUEZ and JOHN MCBRIDE agreed to change a Pomoco Nissan of Hampton buyer's order to reflect JOHN MCBRIDE as the actual purchaser of a 1998 Ford Expedition.

588. On or about April 3, 2001, at First Union Securities, in Newport News, Virginia, JOHN MCBRIDE faxed a Pomoco Nissan of Hampton buyer's order to GLORIA GREEN at the Virginia Educators Credit Union, which had been changed to reflect JOHN MCBRIDE as the purchaser of a 1998 Ford Expedition.

589. On or about April 4, 2001, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE obtained a loan in the amount of \$15,741.55 approved by GLORIA GREEN to finance the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ for which he had obtained a promissory note.

590. On or about April 4, 2001, at Pomoco Nissan of Hampton, in Hampton, Virginia, JOE RODRIGUEZ paid a promissory note by paying \$15,741.55 by a check, the proceeds of a loan in the name of JOHN MCBRIDE and approved by GLORIA GREEN at the Virginia Educators Credit Union.

591. On or about April 4, 2001, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$5,000 in cash, which represented proceeds of drug trafficking, into an account in the name of JOHN MCBRIDE for the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ.

592. On or about April 6, 2001, at First Union National Bank, in Newport News, Virginia, JOHN MCBRIDE deposited \$20,000 in cash, which represented proceeds of drug trafficking, into an account in the name of TPG, LLC for JAMES SMALLWOOD.

593. On or about April 9, 2001, in Richmond, Virginia, ROBERT DUNN, JR. sent a \$1,000 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Houston, Texas.

594. On or about April 9, 2001, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$5,000 in cash, which represented proceeds of drug trafficking, into an account in the name of JOHN MCBRIDE for the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ.



595. On or about April 10, 2001, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$5,710 in cash, which represented proceeds of drug trafficking, into an account in the name of JOHN MCBRIDE for the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ.

596. On or about April 10, 2001, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE transferred \$15,773.25 from his share draft account to pay-off his loan account for the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ.

597. On or about April 15, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

598. On or about April 16, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

599. On or about April 17, 2001, in Houston, Texas, FRED SMITH sent a \$600 Western Union wire transfer to ERIK MILLER, under the alias name Dave Johnson, in Newport News, Virginia.

600. On or about April 17, 2001, in Hampton Roads, JOHN MCBRIDE withdrew \$25,000 at First Union National Bank by a check from an account in the name of TPG, LLC for JAMES SMALLWOOD.

601. On or about April 18, 2001, ERIK MILLER, under the alias name Dave Johnson, Keith Austin, and Ryan Hancock, carrying approximately \$15,000 in cash, which represented proceeds of drug trafficking, traveled on the same flight aboard AirTran Airways from Newport

News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

602. On or about April 19, 2001, Keith Austin and Ryan Hancock traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

603. On or about April 19, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

604. On or about April 22, 2001, in Richmond, Virginia, ROBERT DUNN, JR., distributed approximately 80 pounds of marijuana, at the direction of ERIK MILLER, to Ryan Hancock for further redistribution in Hampton Roads.

605. On or about April 28, 2001, in Houston, Texas, ELIOSA QUINONES made a flight reservation for JOE RODRIGUEZ to fly AirTran Airways from Newport News, Virginia, to Houston, Texas.

606. On or about April 28, 2001, JOE RODRIGUEZ traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

607. On or about April 30, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the May 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

608. On or about May 2, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

609. On or about May 2, 2001, at Ample Storage, in Chesterfield County, Virginia, Aaron Burton leased unit #275 under the alias name JOHN MCBRIDE, for \$45 per month to store marijuana, cocaine, and cash.

610. On or about May 8, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

611. On or about May 9, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

612. On or about May 9, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

613. On or about May 14, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

614. On or about May 17, 2001 at approximately 11:42 a.m., in Houston, Texas, ERIK MILLER, under the alias name Dave Johnson, received a \$900 Western Union wire transfer from Ryan Hancock, under the alias name Jayson Taylor, in Hampton, Virginia.

615. On or about May 17, 2001 at approximately 11:44 a.m., in Houston, Texas, ERIK MILLER, under the alias name Dave Johnson, received a \$900 Western Union wire transfer from Ryan Hancock, under the alias name Jayson Taylor, in Hampton, Virginia.

616. On or about May 17, 2001, in Richmond, Virginia, ROBERT DUNN, JR. sent a \$925 Western Union wire transfer to FREDA SMITH in Houston, Texas.

617. On or about May 18, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

618. On or about May 23, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

619. On or about May 23, 2001, in Norfolk, Virginia, ELOISA QUINONES sent a \$100 Western Union wire transfer to CHARLES VICKERY, II in Houston, Texas.

620. On or about May 28, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the June 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

621. On or about May 30, 2001, in Houston, Texas, FREDA SMITH sent a \$50 Western Union wire transfer to a family member of ROBERT DUNN, JR. in Richmond, Virginia.

622. On or about June 1 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

623. In or about June 2001, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

624. On or about June 1, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

625. On or about June 3, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

626. On or about June 3, 2001, at the Microtel Inn of Newport News, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #322 for eight days.

627. On or about June 3, 2001, at the Microtel Inn of Newport News, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #324 for 11 days.

628. On or about June 13, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Newport News, Virginia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

629. On or about June 24, 2001, ROBERT DUNN, JR. drove a tractor-trailer from Richmond, Virginia, to Houston, Texas, in order to take possession of and transport a quantity of marijuana to Hampton Roads for ERIK MILLER.

630. On or about June 27, 2001, ROBERT DUNN, JR. transported a quantity of marijuana in a tractor-trailer for ERIK MILLER from Houston, Texas, to the Eastern District of Virginia for further redistribution.

631. In or about summer of 2001, at 2805 Build America Drive, in Hampton, Virginia, JOE RODRIGUEZ and CHARLES VICKERY stored approximately 80 kilograms of cocaine for distribution to Aaron Burton in unit #34.

632. In or about July 2001, in Hampton Roads, ERIK MILLER distributed approximately 40 pounds of marijuana to Ryan Hancock for further redistribution.

633. On or about July 1, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the July 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

634. On or about July 1, 2001, at 12823 Carvel Lane, Houston, Texas, DOROTHY SMITH obtained telephone service from Southwestern Bell for telephone number (281) 564-9275, the residence of ERIK MILLER and FREDA SMITH.

635. On or about July 9, 2001, in Houston, Texas, ERIK MILLER, under the alias name Dave Johnson, received a \$2,800 Western Union wire transfer from a family member of Ryan Hancock in Hampton, Virginia.

636. On or about July 17, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

637. On or about July 18, 2001, in Richmond, Virginia, ROBERT DUNN, JR. sent a \$200 Western Union wire transfer to FREDA SMITH in Houston, Texas.

638. On or about July 22, 2001, ERIK MILLER, under the alias name Dave Johnson, traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

639. On or about July 22, 2001, at the Comfort Inn, in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, rented room #312 for three days.

640. On or about July 23, 2001, at Pomoco Lincoln-Mercury of Newport News, Inc., in Newport News, Virginia, JOE RODRIGUEZ purchased a 2001 Lincoln Town Car (VIN:

1LNHM82WX1Y632736) for \$42,511 from PABLO MAS OQUENDO paying \$15,000 in cash, which represented proceeds of drug trafficking, as a down payment.

641. On or about July 23, 2001, at approximately 10:19 a.m., in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$2,900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

642. On or about July 23, 2001, at approximately 10:43 a.m., in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$2,900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

643. On or about July 23, 2001, at approximately 1:24 p.m., in Newport News, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$2,900 Western Union wire transfer to FREDA SMITH in Houston, Texas.

644. On or about July 23, 2001, at approximately 1:56 p.m., in York County, Virginia, ERIK MILLER, under the alias name Dave Johnson, sent a \$1,200 Western Union wire transfer to FREDA SMITH in Houston, Texas.

645. On or about July 23, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$900 Western Union to CHARLES VICKERY, II, in Houston, Texas.

646. On or about July 25, 2001, at Pomoco Lincoln-Mercury of Newport News, Inc., in Newport News, Virginia, JOE RODRIGUEZ paid \$4,511.06 in cash, which represented proceeds of drug trafficking, towards the purchase of a 2001 Lincoln Town Car (VIN: 1LNHM82WX1Y632736) from PABLO MAS OQUENDO.

647. On or about July 25, 2001, at Pomoco Lincoln-Mercury of Newport News, Inc., in Newport News, Virginia, PABLO MAS OQUENDO and JOE RODRIGUEZ caused the office manager to prepare and file a false Form 8300 with the Internal Revenue Service concerning the

cash paid at Pomoco Lincoln-Mercury of Newport News, Inc., on July 23, 2001, and July 25, 2001, for the purchase of a 2001 Lincoln Town Car (VIN: 1LNHM82WX1Y632736) by JOE RODRIGUEZ.

648. On or about July 25, 2001, at Enterprise Rent-A-Car, in Hampton, Virginia, CHARLES VICKERY leased a GEO Metro bearing Virginia license YPW-1749 for six days.

649. On or about July 25, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$400 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

650. On or about August 1, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the August 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

651. On or about August 3, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

652. On or about August 6, 2001, in Houston, Texas, ELOISA QUINONES received a \$900 Western Union wire transfer from a co-conspirator in Norfolk, Virginia.

653. On or about August 8, 2001, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone number (832) 496-1329.

654. On or about August 15, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$500 Western Union wire transfer to CHARLES VICKERY, II, in Houston, Texas.

655. On or about August 20, 2001, in Houston, Texas, JOE RODRIGUEZ sent a \$500 Western Union wire transfer to a co-conspirator in Lima, Ohio.



656. On or about August 24, 2001, in Norfolk, Virginia, CHARLES VICKERY sent a \$200 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

657. On or about September 1, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the September 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

658. On or about September 6, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

659. On or about October 1, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the October 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

660. On or about November 1, 2001, in New Caney, Texas, CHARLES VICKERY rented P. O. Box 1956.

661. On or about November 1, 2001, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the November 2001 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

662. On or about November 5, 2001, in Hampton, Virginia, JOE RODRIGUEZ sent a \$200 Western Union wire transfer to a co-conspirator in Houston, Texas.

663. On or about November 7, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$1,600 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

664. On or about November 16, 2001, at Sprint PCS, in Houston, Texas, CHARLES VICKERY obtained cellular/PCS telephone service with telephone number (832) 527-3324 in a nominee name.

665. On or about December 6, 2001, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

666. On or about December 24, 2001, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

667. In or about 2002, in Richmond, Virginia, TILLMON WOODSON possessed with intent to distribute approximately one (1) kilogram of cocaine.

668. On or about January 2, 2002, at 329 Center Street, in Hampton, Virginia, ANGELA CLARK obtained telephone service from Cavalier Telephone for telephone numbers (757) 265-9195 and (757) 265-9196.

669. On or about January 8, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the January 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

670. On or about January 17, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

671. On or about January 25, 2002, in Houston, Texas, ELOISA QUINONES falsely claimed her employment as a secretary/bookkeeper for Vickery Construction earning \$3,800 per month on an application to finance a 2001 Chevrolet Monte Carlo with Household Auto Finance.

672. On or about January 25, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$100 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

673. On or about January 31, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$900 in cash, which represented proceeds of drug trafficking, for the February 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

674. On or about January 31, 2002, at Sprint PCS, in Houston, Texas, CHARLES VICKERY, II obtained cellular/PCS telephone service with telephone number (713) 256-9663 in his own name, with a billing address of 8206 Bonner Drive, Houston, Texas.

675. On or about February 6, 2002, at Atlantic Self Storage, in Hampton, Virginia, CHARLES VICKERY leased unit #F-645.

676. On or about February 7, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

677. On or about February 7, 2002, at Pomoco Chrysler Plymouth of Newport News, in Newport News, Virginia, CHARLES VICKERY purchased a 2000 GMC pickup truck for \$21,907.77 from PABLO MAS OQUENDO.

678. On or about February 11, 2002, at SouthTrust Bank, in Hampton, Virginia, CHARLES VICKERY opened an account by making a \$2,000 deposit in cash, which represented proceeds of drug trafficking.

679. On or about February 14, 2002, at Checkered Flag Toyota, in Virginia Beach, Virginia, JOE RODRIGUEZ and CHARLES VICKERY purchased a 1999 Nissan pickup truck for \$11,737.65.

680. On or about February 19, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

681. On or about February 19, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

682. On or about February 21, 2002, at Sprint PCS, in Richmond, Virginia, KIET TRUONG obtained cellular/PCS telephone service with telephone number (804) 519-1784 in his own name.

683. On or about February 25, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$200 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

684. On or about February 25, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the March 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

685. On or about February 27, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

686. In or about March of 2002, at 2805 Build America Drive, in Hampton, Virginia, JOE RODRIGUEZ and CHARLES VICKERY stored approximately 30 kilograms of cocaine for distribution to Aaron Burton in unit #34.

687. In or about March of 2002, at 115 Windy Point Drive, in Suffolk, Virginia, JAMES SMALLWOOD received approximately ten (10) kilograms of cocaine from Aaron Burton.

688. In or about March of 2002, in Richmond, Virginia, TILLMON WOODSON purchased approximately 20 kilograms of cocaine from Aaron Burton.

689. On or about March 1, 2002, at SouthTrust Bank, in Hampton, Virginia, CHARLES VICKERY deposited \$6,800 in cash, which represented proceeds of drug trafficking, into an account in the name of CHARLES VICKERY for the purchase of a 2000 GMC pickup truck.

690. On or about March 18, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461.14 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

691. On or about March 22, 2002, in Norfolk, Virginia, CHARLES VICKERY sent a \$400 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

692. On or about March 25, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the April 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

693. On or about April 16, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

694. On or about April 17, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

695. On or about April 20, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$850 in cash, which represented proceeds of drug trafficking, for the May 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

696. On or about April 28, 2002, at the Comfort Inn, in Evergreen, Alabama, CHARLES VICKERY rented room #110 for day.

697. On or about May 6, 2002, at Enterprise Rent-A-Car, in Hampton, Virginia, CHARLES VICKERY leased a Ford E15C van bearing Virginia license YEV-3139 for five days.

698. On or about May 7, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

699. On or about May 21, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

700. On or about May 22, 2002, at First Union National Bank, in Chesapeake, Virginia, JOHN MCBRIDE, opened an account in the name of JCM Information Services, Inc., to launder cash, which represented proceeds of drug trafficking, for JAMES SMALLWOOD and Aaron Burton.

701. On or about May 23, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the June 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

702. On or about May 24, 2002, at Sprint PCS, in Richmond, Virginia, JACQUELINE STEWART obtained cellular/PCS telephone service with telephone number (804) 677-7088.

703. On or about May 26, 2002, at the Holiday Inn Express, in Covington, Georgia, CHARLES VICKERY rented room #128 for one day.

704. On or about May 29, 2002, at Enterprise Rent-A-Car, in Hampton, Virginia, CHARLES VICKERY leased a Chevrolet Monte Carlo bearing Virginia license YBN-8419 for four days.

705. On or about June 3, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

706. On or about June 15, 2002, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone numbers (713) 446-1678 and (713) 446-1395.

707. On or about June 18, 2002, at Nextel Communications, in Hampton Roads, JOHN MCBRIDE obtained cellular/PCS telephone service with telephone number (757) 544-5352 in his own name.

708. On or about June 21, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

709. On or about July 1, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

710. On or about July 1, 2002, in New Caney, Texas, CHARLES VICKERY, II, sent a \$950 Western Union wire transfer to CHARLES VICKERY in Hampton, Virginia.

711. On or about July 2, 2002, in Norfolk, Virginia, CHARLES VICKERY paid \$950 in cash, which represented proceeds of drug trafficking, for the July 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

712. On or about July 17, 2002, in Eastern District of Virginia, CHARLES VICKERY submitted an application for the financing of a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) to be purchased at Pomoco of Smithfield, Inc., and financed with DaimlerChrysler falsely claiming to be employed by Vickery Construction and earning \$5,000 per month.

713. On or about July 17, 2002, in Norfolk, Virginia, CHARLES VICKERY sent a \$900 Western Union wire transfer to ELOISA QUINONES in Houston, Texas.

714. On or about July 18, 2002, in Houston, Texas, ELOISA QUINONES purchased a Travelers Express money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

715. On or about July 18, 2002, at Pomoco of Smithfield, Inc., in Smithfield, Virginia, CHARLES VICKERY purchased a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) from PABLO MAS OQUENDO \$38,453.98.



716. On or about July 20, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$50 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

717. On or about July 22, 2002, in New Caney, Texas, CHARLES VICKERY, II, sent a \$900 Western Union wire transfer to CHARLES VICKERY in Norfolk, Virginia.

718. On or about July 30, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the August 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

719. On or about July 30, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell & Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

720. On or about July 30, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$50 Western Union wire transfer to a co-conspirator in Brownsville, Texas.

721. On or about July 31, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., sent an \$800 Western Union wire transfer to a co-conspirator in Mission, Texas.

722. On or about August 6, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$100 Western Union wire transfer to a co-conspirator in Pharr, Texas.

723. On or about August 8, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

724. On or about August 9, 2002, at 7407 Dell Drive, in Chesterfield County, Virginia, KIET TRUONG possessed with intent to distribute a quantity of marijuana.

725. On or about August 20, 2002, at Mini-Price Self Storage, in Newport News, Virginia, MARCUS TAYLOR rented storage unit #9, for Aaron Burton to store cocaine, marijuana, cash, a currency counting machine, and digital scales.

726. On or about August 23, 2002, in New Caney, Texas, CHARLES VICKERY, II, sent a \$900 Western Union wire transfer to CHARLES VICKERY in Norfolk, Virginia.

727. On or about August 30, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the September 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

728. On or about September 3, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

729. On or about September 4, 2002, at Bank One, NA, in Hampton Roads, CHARLES VICKERY withdrew \$421 from an account in the name of Vickery Construction by a check as a loan payment on the purchase of a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083).

730. On or about September 20, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

731. On or about September 27, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the October 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

732. On or about October 1, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

733. On or about October 1, 2002, at Bank One, NA, in Hampton Roads, CHARLES VICKERY withdrew \$421.26 from an account in the name of Vickery Construction by a check as a loan payment on the purchase of a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083).

734. On or about October 23, 2002, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

735. On or about October 25, 2002, at Casey BMW, in Newport News, Virginia, JAMES SMALLWOOD purchased a 2003 BMW 745L (VIN: WBAGN63493DR08281) for \$81,480.

736. On or about October 28, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, the November 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

737. On or about November 4, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

738. On or about November 4, 2002, at Bank One, NA, in Hampton Roads, CHARLES VICKERY withdrew \$421.26 from an account in the name of Vickery Construction by a check

as a loan payment on the purchase of a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083).

739. On or about November 13, 2002, at the Wards Corner Branch of First Union National Bank, in Norfolk, Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

740. On or about November 13, 2002, at the 21<sup>st</sup> and Granby Street Branch of First Union National Bank, in Norfolk, Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

741. On or about November 13, 2002, at the Waterside Branch of First Union National Bank, in Norfolk, Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

742. On or about November 14, 2002, at First Union National Bank, in the Eastern District of Virginia, Aaron Burton deposited \$2,600 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

743. On or about November 14, 2002, at the Hodges Ferry Branch of First Union National Bank, in Chesapeake, Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

744. On or about November 14, 2002, at the Coliseum Mall Branch of First Union National Bank, in Hampton, Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

745. On or about November 14, 2002, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone number (832) 689-2238.

746. In or about November 2002, in the Eastern District of Virginia, JOHN MCBRIDE received approximately \$25,000 in cash, which represented proceeds of drug trafficking, from Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

747. On or about November 14, 2002, at First Union National Bank, in Chesapeake, Virginia, JOHN MCBRIDE deposited \$5,000 in cash, which represented proceeds of drug trafficking, into an account in the name of JOHN MCBRIDE to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

748. On or about November 15, 2002, at the Hodges Ferry Branch of First Union National Bank, in Chesapeake, Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

749. On or about November 18, 2002, at First Union National Bank, in the Eastern District of Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

750. On or about November 18, 2002, at First Union National Bank, in the Eastern District of Virginia, Aaron Burton deposited \$2,800 in cash, which represented proceeds of drug trafficking, into an account in the name of Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

751. On or about November 18, 2002, at First Union National Bank, in Chesapeake, Virginia, JOHN MCBRIDE deposited \$5,000 in cash, which represented proceeds of drug trafficking, into an account in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

752. On or about November 18, 2002, at First Union National Bank, in Chesapeake, Virginia, JOHN MCBRIDE deposited a check for \$6,700 into an account in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

753. On or about November 18, 2002, at First Union National Bank, in the Eastern District of Virginia, JOHN MCBRIDE withdrew \$6,700 from an account in the name of JOHN MCBRIDE by a check payable to JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

754. On or about November 18, 2002, at Verizon Wireless, in Hampton Roads, JAMES SMALLWOOD obtained cellular telephone service with telephone number (757) 615-1198 in his own name.

755. On or about November 20, 2002, at First Union National Bank, in Hampton Roads, JOHN MCBRIDE deposited \$5,000 in cash, which represented proceeds of drug trafficking, into an account in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

756. On or about November 20, 2002, at the Virginia Educators Credit Union, in Newport News, Virginia, JOHN MCBRIDE deposited \$5,000 in cash, which represented proceeds of drug trafficking, into an account in the name of JOHN MCBRIDE to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

757. On or about November 21, 2002, in the Eastern District of Virginia, JOHN MCBRIDE signed two checks totaling \$5,100 payable to Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

758. On or about November 22, 2002, at First Union National Bank, in Chesapeake, Virginia, JOHN MCBRIDE deposited \$4,145 in cash, which represented proceeds of drug trafficking, into an account in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

759. On or about November 25, 2002, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

760. On or about November 29, 2002, at First Union National Bank, in Hampton Roads, JOHN MCBRIDE withdrew \$19,150 from an account in the name of JCM Information Services, Inc., by a check payable to Aaron Burton and falsely claimed it was for a "consulting contract" when he knew it was to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

761. On or about November 29, 2002, at First Union National Bank, in the Eastern District of Virginia, Aaron Burton withdrew \$25,000 from an account in the name of Aaron Burton by a check payable to a family member of a co-conspirator to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

762. On or about November 29, 2002, in the Eastern District of Virginia, JOHN MCBRIDE delivered three checks totaling \$24,250 to Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

763. On or about November 30, 2002, at nTelos, in Hampton Roads, LATARSHA GORE obtained cellular/PCS telephone service with telephone number (757) 735-6356.

764. On or about December 1, 2002, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the December 2002 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

765. On or about December 2, 2002, at Pomoco Chrysler of Newport News, in Newport News, Virginia, JOE RODRIGUEZ purchased a 2000 Lincoln LS for \$20,808 from PABLO MAS OQUENDO.

766. On or about December 2, 2002, at the Virginia Educators Credit Union, in Hampton Roads, JOHN MCBRIDE withdrew \$5,000 from an account in the name of JOHN MCBRIDE by a check payable to Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

767. On or about December 2, 2002, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

768. On or about December 3, 2002, at Bank One, NA, in Hampton Roads, CHARLES VICKERY withdrew \$421 from an account in the name of Vickery Construction by a check as a loan payment on the purchase of a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083).



769. On or about December 11, 2002, at First Union National Bank, in the Eastern District of Virginia, Aaron Burton withdrew \$25,000 from an account in the name of Aaron Burton by a check payable to a family member of a co-conspirator to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.

770. On or about December 17, 2002, in New Caney, Texas, CHARLES VICKERY, II, sent a \$900 Western Union wire transfer to CHARLES VICKERY in Norfolk, Virginia.

771. On or about December 21, 2002, at nTelos, in Hampton Roads, MARCUS TAYLOR obtained cellular/PCS telephone service for ANGELA CLARK and himself with telephone numbers (757) 696-9123 and (757) 696-9194.

772. On or about December 24, 2002, in Houston, Texas, LAZARO RAMIREZ, JR., received a \$900 Western Union wire transfer from a co-conspirator in Mission, Texas.

773. On or about December 24, 2002, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

774. In or about 2003, in Richmond, Virginia, TILLMON WOODSON possessed with intent to distribute approximately one (1) kilogram of cocaine.

775. On or about January 3, 2003, at Bank One, NA, in Hampton Roads, CHARLES VICKERY withdrew \$421.26 from an account in the name of Vickery Construction by a check as a loan payment on the purchase of a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083).

776. On or about January 13, 2003, at 34 W. Queens Way, in Hampton, Virginia, Aaron Burton purchased 5525 Germain Road, Richmond, Virginia, from a family member of a co-conspirator for \$50,000.

777. On or about January 23, 2003, in Houston, Texas, ELOISA QUINONES purchased a United States Postal money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

778. On or about February 12, 2003, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$1,200 Western Union wire transfer to a co-conspirator in McAllen, Texas.

779. On or about February 24, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

780. On or about February 25, 2003, at the Pomoco Auto Group, in Newport News, Virginia, ROBERT DARR purchased a 2002 Chevrolet Corvette (VIN: 1G1YY32G525124514) for JOE RODRIGUEZ.

781. On or about March 25, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

782. On or about April 11, 2003, at Bay Area Ford, Inc., in Houston, Texas, JOE RODRIGUEZ purchased a 2002 Ford Econoline van for \$20,331.21.

783. On or about April 25, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

784. On or about April 29, 2003, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$1,600 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

785. On or about May 1, 2003, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

786. On or about May 1, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

787. On or about May 17, 2003, at Verizon Wireless, in Hampton Roads, JAMES SMALLWOOD obtained cellular telephone service with telephone number (757) 615-2955 in his own name.

788. On or about May 19, 2003, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone numbers (832) 428-2280 and (832) 545-3094.

789. On or about May 23, 2003, at Triton PCS, in Hampton Roads, BRIAN MASON obtained cellular/PCS telephone service with telephone number (757) 773-2340 in a nominee name.

790. On or about May 24, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

791. On or about June 11, 2003, CHARLES VICKERY traveled via AirTran Airways from Houston, Texas, to Newport News, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

792. On or about June 13, 2003, CHARLES VICKERY traveled via AirTran Airways from Newport News, Virginia, to Atlanta, Georgia.

793. On or about June 14, 2003, CHARLES VICKERY traveled via AirTran Airways from Atlanta, Georgia, to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

794. On or about June 25, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

795. On or about July 1, 2003, at Blue & Gray Self Storage, in Chesterfield County, Virginia, Aaron Burton leased unit #B25-96 to store marijuana, cocaine, and cash and listed on the application JOHN MCBRIDE as an alternate contact person.

796. On or about July 16, 2003, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$1,700 by check for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

797. In or about the summer of 2003, in Norfolk, Virginia, CHARLES VICKERY directed Aaron Burton to remove an Essex Arms .45 caliber pistol, a Fabrique Nationale 9mm pistol, a Ruger .22 caliber pistol/rifle, and Safariland Morgan Magnum textured body armor from 646 W. Ocean View Avenue.

798. In or about August 2003, at 1051 W. Ocean View Avenue, Norfolk, Virginia, CHARLES VICKERY and Lionel Joyner possessed with intent to distribute approximately 1500 pounds of marijuana.

799. On or about August 5, 2003, at Russell & Smith Ford, in Houston, Texas, JOE RODRIGUEZ purchased a 1998 Ford Taurus.

800. On or about August 6, 2003, at Verizon Wireless, in Houston, Texas, LAZARO RAMIREZ, JR., obtained cellular/PCS telephone service with telephone number (713) 817-7819 in his own name.

801. On or about August 8, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

802. On or about August 26, 2003, at T-Mobile USA, Inc., in Dallas, Texas, RICARDO MANCHA obtained cellular/PCS telephone service with telephone number (469) 733-5187 in a nominee name.

803. In or about September 2003, at 1051 W. Ocean View Avenue, Norfolk, Virginia, CHARLES VICKERY and Lionel Joyner possessed with intent to distribute approximately 2000 pounds of marijuana.

804. On or about September 5, 2003, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$800 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

805. On or about September 8, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

806. In or about September 2003, at 1051 W. Ocean View Avenue, Norfolk, Virginia, CHARLES VICKERY and Lionel Joyner possessed approximately \$40,000 in cash, which represented proceeds of drug trafficking.

807. On or about September 16, 2003, at 502 Marshall Street, in Hampton, Virginia, ANGELA CLARK obtained telephone service from Cox Communications for telephone number (757) 224-3958.

808. On or about September 25, 2003, in Houston, Texas, ELOISA QUINONES purchased a Travelers Express money order in the amount of \$461 as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

809. On or about September 30, 2003, at Pomoco Chrysler Plymouth of Newport News, in Newport News, Virginia, CHARLES VICKERY, purchased a 1999 Dodge Caravan for \$3,443.17.

810. In or about the fall of 2003, at 1051 W. Ocean View Avenue, in Norfolk, Virginia, CHARLES VICKERY and RICHARD LESTER possessed with intent to distribute a quantity of marijuana.

811. On or about October 1, 2003, in Norfolk, Virginia, CHARLES VICKERY obtained public utilities (water) in his name at 646 W. Ocean View Avenue.

812. On or about October 2, 2003, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

813. On or about October 6, 2003, at approximately 3:50 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to ELOISA QUINONES at 8206 Bonner Drive, Houston, Texas.

814. On or about October 6, 2003, at approximately 3:52 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a

quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.

815. On or about October 7, 2003, in Newport News, Virginia, CHARLES VICKERY paid Powell and Associates Realty, Inc., \$1,600 in cash, which represented proceeds of drug trafficking, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

816. On or about October 8, 2003, at 411 Fort Worth Avenue, Apartment 3, in Norfolk, Virginia, BRIAN MASON, JARICE MASON, and two co-conspirators possessed with intent to distribute approximately 22 grams of cocaine base and approximately one pound of marijuana.

817. On or about October 9, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.

818. On or about October 9, 2003, in Hampton Roads, JOE RODRIGUEZ registered a 2003 Ford Taurus at 646 W. Ocean View Avenue, Norfolk, Virginia.

819. On or about October 9, 2003, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

820. On or about October 10, 2003, at a Virginia Department of Motor Vehicles in Hampton Roads, JOE RODRIGUEZ changed the address on his Virginia driver's license to 646 Ocean View Avenue, Norfolk, Virginia, the address of CHARLES VICKERY.

821. On or about October 13, 2003, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

822. On or about October 14, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to ELOISA QUINONES at 8206 Bonner Drive, Houston, Texas.

823. On or about October 14, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.

824. On or about October 15, 2003, at approximately 4:18 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

825. On or about October 15, 2003, at approximately 4:20 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.

826. On or about October 20, 2003, at approximately 4:22 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.



827. On or about October 20, 2003, at approximately 4:24 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

828. On or about October 22, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

829. On or about October 22, 2003, at Sprint PCS, in Hampton Roads, JARICE MASON obtained cellular/PCS telephone service with telephone numbers (757) 450-3216 and (757) 575-2285 in his own name.

830. On or about October 26, 2003, at Verizon Wireless, in Houston, Texas, CHARLES VICKERY, II, obtained cellular/PCS telephone service for a co-conspirator with telephone number (281) 770-3075, with a billing address of 22672 Gabriel Street, New Caney, Texas.

831. On or about October 28, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to ELOISA QUINONES at 8206 Bonner Drive, Houston, Texas.

832. On or about October 30, 2003, in Norfolk, Virginia, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Houston, Texas.

833. On or about October 31, 2003, at approximately 4:27 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a

quantity of cash, which represented proceeds of drug trafficking, to ELOISA QUINONES at 8206 Bonner Drive, Houston, Texas.

834. On or about October 31, 2003, at approximately 4:28 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

835. On or about October 31, 2003, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$1,900 in cash, which represented proceeds of drug trafficking, for the November 2003 and December 2003 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

836. In or about November 2003, ELOISA QUINONES traveled via airplane from Houston, Texas, to Norfolk, Virginia, to meet with CHARLES VICKERY.

837. In or about November 2003, in Virginia Beach, Virginia, ELOISA QUINONES possessed with intent to distribute a quantity of cocaine.

838. On or about November 1, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.

839. On or about November 1, 2003, at Pomoco Chrysler Plymouth of Newport News, in Newport News, Virginia, CHARLES VICKERY purchased a 1998 Ford Taurus from PABLO MAS OQUENDO for \$3,971.17, in cash, which represented proceeds of drug trafficking.

840. On or about November 3, 2003, at approximately 2:21 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a

quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

841. On or about November 3, 2003, at approximately 2:22 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.

842. On or about November 3, 2003, at approximately 2:25 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to ELOISA QUINONES at 8206 Bonner Drive, Houston, Texas.

843. On or about November 5, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II, at P. O. Box 1956, New Caney, Texas.

844. In or about November 2003, in Houston, Texas, CHARLES VICKERY sent a Federal Express package containing a quantity of cocaine for distribution to 646 W. Ocean View Avenue, Norfolk, Virginia.

845. In or about mid-November 2003, at 2805 Build America Drive, in Hampton, Virginia, CHARLES VICKERY and two co-conspirators removed a wall inside storage unit #34 so to accommodate a large trailer that CHARLES VICKERY utilized to transport marijuana and cocaine.

846. On or about November 17, 2003, at Sprint PCS, in Hampton Roads, CHARLES VICKERY, II, terminated cellular/PCS telephone service for (713) 256-9663 and obtained

cellular/PCS telephone service for himself with telephone number (757) 660-1286 and for CHARLES VICKERY with telephone number (757) 660-1441, with a billing address of 8206 Bonner Drive, Houston, Texas.

847. On or about November 17, 2003, at Bank One, NA, in Hampton Roads, CHARLES VICKERY withdrew \$460 from an account in the name of Vickery Construction by a check as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

848. On or about November 17, 2003, at approximately 1:15 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

849. On or about November 17, 2003, at approximately 1:16 p.m., in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to CHARLES VICKERY, II at P. O. Box 1956, New Caney, Texas.

850. On or about November 18, 2003, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$2,000 Western Union wire transfer to a co-conspirator in Rio Grande City, Texas.

851. On or about November 19, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ at 12800 Woodforest Boulevard, Apartment 903, Houston, Texas.

852. In or about late 2003, at 1051 W. Ocean View Avenue, Norfolk, Virginia, CHARLES VICKERY and Lionel Joyner possessed with intent to distribute approximately 2000 pounds of marijuana.

853. On or about November 24, 2003, at approximately 9:15 a.m., in Norfolk, Virginia, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Roma, Texas.

854. On or about November 24, 2003, at approximately 9:32 a.m., in Norfolk, Virginia, LAZARO RAMIREZ, JR., sent a \$300 Western Union wire transfer to a co-conspirator in Roma, Texas.

855. On or about November 24, 2003, at approximately 9:34 a.m., in Norfolk, Virginia, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Houston, Texas.

856. On or about November 24, 2003, at approximately 10:33 a.m., in Newport News, Virginia, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Roma, Texas.

857. On or about November 24, 2003, at approximately 10:49 a.m., in Hampton, Virginia, LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer to a co-conspirator in Roma, Texas.

858. On or about November 24, 2003, LAZARO RAMIREZ, JR., and CHARLES VICKERY, II, traveled from Hampton Roads to Houston, Texas.

859. On or about November 25, 2003, a co-conspirator transported a quantity of cash, which represented proceeds of drug trafficking that was received from LAZARO RAMIREZ, JR., via Western Union from Roma, Texas, into Mexico.

860. On or about November 25, 2003, in Houston, Texas, ELOISA QUINONES sent a \$461 Western Union wire transfer as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

861. On or about November 28, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to ELOISA QUINONES at 8206 Bonner Drive, Houston, Texas.

862. On or about November 28, 2003, at Triton PCS, in Hampton Roads, ROBERT DARR obtained cellular/PCS telephone service with telephone number (757) 291-1690 in his own name.

863. On or about November 30, 2003, CHARLES VICKERY traveled in a vehicle from Hampton Roads to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

864. On or about December 1, 2003, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$3,000 Western Union wire transfer to a co-conspirator in Roma, Texas.

865. On or about December 1, 2003, at T-Mobile USA, Inc., in Houston, Texas, JOE RODRIGUEZ, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service for himself with telephone number (832) 512-0765 and for CHARLES VICKERY with telephone number (832) 512-1460.

866. On or about December 2, 2003, CHARLES VICKERY traveled via Delta Airlines from Atlanta, Georgia, to Richmond, Virginia, to oversee the distribution of marijuana and cocaine and the collection of drug proceeds.

867. On or about December 3, 2003, CHARLES VICKERY traveled via from Richmond, Virginia, to Atlanta, Georgia.

868. On or about December 4, 2003, at 8206 Bonner Drive, in Houston, Texas, CHARLES VICKERY received a United States Postal Service Express Mail package containing

a quantity of cash, which represented proceeds of drug trafficking that was sent from Lionel Joyner in Norfolk, Virginia.

869. On or about December 6, 2003, at 8206 Bonner Drive, in Houston, Texas, CHARLES VICKERY received a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking that was sent from Lionel Joyner in Norfolk, Virginia.

870. On or about December 9, 2003, in Houston, Texas, CHARLES VICKERY directed Lionel Joyner to purchase 12 United States Postal money orders totaling \$7,600 and to leave the payee name blank.

871. On or about December 9, 2003, in Norfolk, Virginia, two co-conspirators purchased 12 United States Postal money orders totaling \$7,600 with the payee name left blank for CHARLES VICKERY and Lionel Joyner.

872. On or about December 9, 2003, in Houston, Texas, CHARLES VICKERY directed Lionel Joyner to mail the 12 United States Postal money orders totaling \$7,600 to a co-conspirator in the Dominican Republic.

873. On or about December 10, 2003, at 8206 Bonner Drive, in Houston, Texas, CHARLES VICKERY received a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking that was sent from Lionel Joyner using the name, "JACK THA DOG," in Norfolk, Virginia.

874. On or about December 10, 2003, at 8206 Bonner Drive, in Houston, Texas, CHARLES VICKERY received a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking that was sent from a co-conspirator in Norfolk, Virginia.

875. On or about December 11, 2003, at 8:18 p.m., in Newport News, Virginia, PABLO MAS OQUENDO, at the direction of ROBERT DARR, called CHARLES VICKERY to advise him that law enforcement had just contacted the Pomoco Auto Group in Newport News, Virginia, to inquire about vehicles purchased there by JOE RODRIGUEZ, CHARLES VICKERY, and JOHN MCBRIDE.

876. On or about December 11, 2003, at 8:19 p.m., in Houston, Texas, CHARLES VICKERY, at the direction of PABLO MAS OQUENDO, called ROBERT DARR at his residence, 7505-9E River Road, Newport News, Virginia, to discuss the recent contact by law enforcement at the Pomoco Auto Group in Newport News, Virginia, regarding vehicles purchased there by JOE RODRIGUEZ, CHARLES VICKERY, and JOHN MCBRIDE.

877. On or about December 12, 2003, CHARLES VICKERY drove a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) bearing Virginia license plate WD-7065 from Houston, Texas, to the Eastern District of Virginia with approximately four kilograms of cocaine.

878. On or about December 12, 2003, in Houston, Texas, CHARLES VICKERY, II, ceased using Sprint PCS telephone (757) 660-1286 because of law enforcement's inquiry at the Pomoco Auto Group in Newport News, Virginia, on December 11, 2003.

879. On or about December 13, 2003, at 8206 Bonner Drive, in Houston, Texas, ELOISA QUINONES received a United States Postal Service Express Mail package addressed to CHARLES VICKERY containing a quantity of cash, which represented proceeds of drug trafficking, that was sent from Lionel Joyner in Norfolk, Virginia.

880. On or about December 13, 2003, in Houston, Texas, CHARLES VICKERY ceased using Sprint PCS telephone (757) 660-1441 and began using pre-paid T-Mobile USA,



Inc. cellular/PCS telephone (832) 512-1460 because of law enforcement's inquiry at the Pomoco Auto Group in Newport News, Virginia, on December 11, 2003.

881. On or about December 13, 2003, in Houston, Texas, JOE RODRIGUEZ ceased using Sprint PCS telephone (832) 368-4618 because of law enforcement's inquiry at the Pomoco Auto Group in Newport News, Virginia, on December 11, 2003.

882. On or about December 13, 2003, at T-Mobile USA, Inc., in Houston, Texas, JOE RODRIGUEZ, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service with telephone number (832) 755-0415 because of law enforcement's inquiry at the Pomoco Auto Group in Newport News, Virginia, on December 11, 2003.

883. On or about December 14, 2003, at the Microtel Inn, in Henrico County, Virginia, CHARLES VICKERY distributed approximately four (4) kilograms of cocaine to Aaron Burton for further redistribution.

884. In or about December 2003, at 646 W. Ocean View Avenue, in Norfolk, Virginia, CHARLES VICKERY vacated the residence because of law enforcement's inquiry at the Pomoco Auto Group in Newport News, Virginia, on December 11, 2003.

885. In or about December 2003, at 2805 Build America Drive, in Hampton, Virginia, CHARLES VICKERY vacated storage unit #34 that was used to store cocaine, marijuana and cash because of the law enforcement contact at the Pomoco Auto Group in Newport News, Virginia, on December 11, 2003.

886. On or about December 19, 2003, at 8206 Bonner Drive, in Houston, Texas, CHARLES VICKERY received a United States Postal Service Express Mail package containing

a quantity of cash, which represented proceeds of drug trafficking, that was sent from Lionel Joyner using the name "JACK THA DOG," in Norfolk, Virginia.

887. On or about December 19, 2003, at Pomoco Chrysler Plymouth of Newport News, in Newport News, Virginia, PABLO MAS OQUENDO sold a 2000 Plymouth Voyager van to Lionel Joyner for \$4,500, which was paid for by a Wachovia Bank official check.

888. On or about December 21, 2003, at approximately 6:26 p.m., in Fort Mitchell, Kentucky, RICHARD LESTER, under the alias name Mark Shepard, sent a \$920 Western Union wire transfer to a co-conspirator in Las Vegas, Nevada.

889. On or about December 21, 2003, at approximately 6:30 p.m., in Fort Mitchell, Kentucky, RICHARD LESTER, under the alias name Mark Shepard, sent a \$920 Western Union wire transfer to a co-conspirator in Las Vegas, Nevada.

890. On or about December 22, 2003, at approximately 11:45 a.m., in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$2,000 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

891. On or about December 22, 2003, at approximately 12:33 p.m., in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$2,000 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

892. On or about December 22, 2003, in Norfolk, Virginia, CHARLES VICKERY sent a United States Postal Service Express Mail package containing a quantity of cash, which represented proceeds of drug trafficking, to ELOISA QUINONES at 8206 Bonner Drive, Houston, Texas.

893. On or about December 23, 2003, at T-Mobile USA, Inc., in Houston, Texas, JOE RODRIGUEZ, without using a name but using a false date of birth, obtained pre-paid

cellular/PCS telephone service for himself with telephone number (832) 860-7306 and for CHARLES VICKERY with telephone number (832) 860-7303.

894. On or about December 26, 2003, CHARLES VICKERY flew from Houston, Texas, to Newport News, Virginia, to oversee the distribution of cocaine and the collection of drug proceeds.

895. On or about December 27, 2003, at the Econo Lodge West Ocean View, in Norfolk, Virginia, CHARLES VICKERY rented room #209 for two days.

896. On or about December 29, 2003, at Bank One, NA, in Hampton Roads, CHARLES VICKERY withdrew \$457.70 from an account in the name of Vickery Construction by a check as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

897. On or about January 4, 2004, CHARLES VICKERY traveled from Hampton Roads to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

898. On or about January 5, 2004, in Dallas, Texas, RICARDO MANCHA received a \$200 Western Union wire transfer from a co-conspirator in McAllen, Texas.

899. On or about January 13, 2004, CHARLES VICKERY and ELOISA QUINONES transported a quantity of marijuana in a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) bearing Virginia license plate WD-7065 from Houston, Texas, to Hampton Roads.

900. On or about January 14, 2004, at the Radisson Hotel, in Hampton, Virginia, CHARLES VICKERY rented room #221 for three days.

901. On or about January 15, 2004, at the Radisson Hotel, in Hampton, Virginia, ELOISA QUINONES possessed with intent to distribute a quantity of cocaine in room #221.

902. On or about January 17, 2004, in Norfolk, Virginia, CHARLES VICKERY paid an individual \$950 in cash, which represented proceeds of drug trafficking, for the January 2004 rental of 646 W. Ocean View Avenue, Norfolk, Virginia.

903. On or about January 19, 2004, in Dallas, Texas, RICARDO MANCHA received a \$100 Western Union wire transfer from a co-conspirator in McAllen, Texas.

904. On or about January 20, 2004, at 502 Marshall Street, in Hampton, Virginia, MARCUS TAYLOR and ANGELA CLARK possessed with intent to distribute a quantity of marijuana.

905. On or about January 23, 2004, at the Hampton Inn-Airport, in Norfolk, Virginia, CHARLES VICKERY and ELOISA QUINONES rented room #140 for two days.

906. On or about January 24, 2004, at 1051 W. Ocean View Avenue, in Norfolk, Virginia, CHARLES VICKERY called Aaron Burton to inform him that Lionel Joyner had been severely beaten and asked Aaron Burton to have MARCUS TAYLOR assist in removing approximately 200 pounds of marijuana from Lionel Joyner's residence.

907. On or about January 24, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, Aaron Burton called MARCUS TAYLOR to have him travel to 1051 W. Ocean View Avenue, Norfolk, Virginia, to assist CHARLES VICKERY in removing approximately 200 pounds of marijuana.

908. On or about January 24, 2004, at 1051 W. Ocean View Avenue, in Norfolk, Virginia, CHARLES VICKERY and MARCUS TAYLOR removed approximately 200 pounds of marijuana and transported it to 502 Marshall Street, Hampton, Virginia, for storage overnight.

909. On or about January 24, 2004, at 1051 W. Ocean View Avenue, in Norfolk, Virginia, CHARLES VICKERY called a co-conspirator to request assistance transporting the severely beaten body of Lionel Joyner.

910. On or about January 24, 2004, at 1051 W. Ocean View Avenue, in Norfolk, Virginia, CHARLES VICKERY and a co-conspirator removed the severely beaten body of Lionel Joyner and transported him to room #140 at the Hampton Inn-Airport in Norfolk, Virginia.

911. On or about January 24, 2001, in Norfolk, Virginia, CHARLES VICKERY, ELOISA QUINONES, and a co-conspirator transported the severely beaten body of Lionel Joyner from room #140 at the Hampton Inn - Airport to DePaul Medical Center.

912. On or about January 24, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$1,300 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

913. On or about January 25, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$1,000 Western Union wire transfer to a co-conspirator in Santo Domingo, Dominican Republic.

914. On or about January 25, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$1,000 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

915. On or about January 25, 2004, CHARLES VICKERY, ELOISA QUINONES, and Aaron Burton transported approximately 200 pounds of marijuana in a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) bearing Virginia license plate WD-7065 from 502 Marshall Street, Hampton, Virginia, to the Blue & Gray Self Storage in Chesterfield County, Virginia, for storage.

916. On or about January 25, 2004, at the Blue & Gray Self Storage in Chesterfield County, Virginia, CHARLES VICKERY possessed a Glock 9mm pistol while transporting approximately 200 pounds of marijuana.

917. On or about January 26, 2004, CHARLES VICKERY and ELOISA QUINONES traveled in a vehicle from Hampton Roads to Houston, Texas, to make arrangements to obtain a quantity of marijuana and cocaine.

918. On or about January 26, 2004, at Bank One, NA, in Houston, Texas, ELOISA QUINONES withdrew \$460.14 from an account in the name of Vickery Construction by a check as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

919. On or about January 31, 2004, in Houston, Texas, CHARLES VICKERY loaded a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) bearing Virginia license plate WD-7065 with approximately ten (10) kilograms of cocaine and left the Houston, Texas, area destined for the Eastern District of Virginia.

920. On or about February 1, 2004, at the Best Western Governor's Inn, 9826 Midlothian Turnpike, in Richmond, Virginia, RICHARD LESTER, under the alias name Mark Sheppard, and CHARLES VICKERY rented room #210 for five days.

921. On or about February 2, 2004, at the Best Western Governor's Inn, 9826 Midlothian Turnpike, in Richmond, Virginia, RICHARD LESTER distributed approximately 10 kilograms of cocaine to Aaron Burton at the direction of CHARLES VICKERY.

922. On or about February 2, 2004, in Richmond, Virginia, Aaron Burton distributed approximately one kilogram of cocaine to TILLMON WOODSON.

923. On or about February 2, 2004, in Henrico County, Virginia, Aaron Burton possessed with intent to distribute approximately four kilograms of cocaine and approximately

40 pounds of marijuana at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

924. On or about February 4, 2004, at the Best Western Governor's Inn, 9826 Midlothian Turnpike, in Richmond, Virginia, CHARLES VICKERY met RICHARD LESTER at the hotel in a 2001 Buick four door sedan bearing Kentucky license plate 175NET.

925. On or about February 4, 2004, at Sprint PCS, in Richmond, Virginia, Aaron Burton obtained cellular/PCS telephone service with telephone number (804) 405-2054 for SEAN QUARLES.

926. On or about February 5, 2004, at the Best Western Governor's Inn, 9826 Midlothian Turnpike, in Richmond, Virginia, CHARLES VICKERY collected \$180,000 in cash, which represented proceeds of drug trafficking, from Aaron Burton for the ten (10) kilograms of cocaine distributed by RICHARD LESTER.

927. On or about February 5, 2004, CHARLES VICKERY traveled from Richmond, Virginia, in a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) bearing Virginia license plate WD-7065 to Houston, Texas, arriving on February 6, 2004.

928. On or about February 7, 2004, at T-Mobile USA, Inc., in Houston, Texas, CHARLES VICKERY, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service with telephone number (832) 868-7090.

929. On or about February 9, 2004, at AT&T Wireless, Oklahoma City, Oklahoma, RICHARD LESTER, under the alias name Mark Shepard, obtained cellular/PCS telephone service with telephone number (254) 722-4765.

930. On or about February 11, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$1,000 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

931. On or about February 16, 2004, in Dallas, Texas, RICARDO MANCHA received a \$100 Western Union wire transfer from a co-conspirator in McAllen, Texas.

932. On or about February 17, 2004, at T-Mobile USA, Inc., in Houston, Texas, JOE RODRIGUEZ, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service with telephone number (832) 876-1859.

933. On or about February 18, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$600 Western Union wire transfer to a co-conspirator in Roma, Texas.

934. On or about February 19, 2004, at T-Mobile USA, Inc., in Houston, Texas, CHARLES VICKERY, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service for himself with telephone number (832) 573-0468.

935. On or about February 23, 2004, at Bank One, NA, in Houston, Texas, CHARLES VICKERY withdrew \$460.14 from an account in the name of Vickery Construction by check as a loan payment on the purchase of a 2001 Chevrolet Monte Carlo.

936. On or about February 26, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$2,500 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

937. On or about February 27, 2004, at T-Mobile USA, Inc., in Houston, Texas, JOE RODRIGUEZ, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service for himself with telephone number (832) 878-7125 and for CHARLES VICKERY with telephone number (832) 434-5240.



938. On or about March 2, 2004, at T-Mobile USA, Inc., in Houston, Texas, JESUS CEBALLOS, without using a name but using a false date of birth, obtained pre-paid cellular/PCS for himself with telephone number (832) 298-2273.

939. On or about March 3, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$1,000 Western Union wire transfer to a co-conspirator in Miguel Aleman, Tampico, Mexico.

940. On or about March 4, 2004, in Richmond, Virginia, SEAN QUARLES informed Aaron Burton that he was considering obtaining a quantity of cocaine from that drug supplier at a cheaper cost.

941. On or about March 5, 2004, in Houston, Texas, CHARLES VICKERY called Aaron Burton in Richmond, Virginia, to discuss the difficulties that JOE RODRIGUEZ was having importing cocaine and marijuana into the United States from a co-conspirator (hereinafter referred to as a source of supply in Mexico) in Mexico.

942. On or about March 5, 2004, in Henrico County, Virginia, a co-conspirator possessed a quantity of marijuana at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

943. On or about March 7, 2004, in Richmond, Virginia, KIET TROUNG ordered a quantity of marijuana from Aaron Burton.

944. On or about March 8, 2004, at Ukrops, in Chesterfield County, Virginia, SEAN QUARLES purchased baking soda for Aaron Burton to use to "cook" cocaine into cocaine base.

945. On or about March 8, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, SEAN QUARLES and Aaron Burton "cooked" a quantity of cocaine into cocaine base for distribution.

946. On or about March 8, 2004, in Richmond, Virginia, SEAN QUARLES distributed a quantity of marijuana to a co-conspirator for further redistribution.

947. On or about March 8, 2004, in Richmond, Virginia, SEAN QUARLES distributed a quantity of cocaine to a co-conspirator for Aaron Burton for further redistribution.

948. On or about March 8, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the status of the collection of cash, which represented proceeds of drug trafficking, from co-conspirators.

949. On or about March 9, 2004, in Richmond, Virginia, SEAN QUARLES and Aaron Burton discussed the status of the collection of cash, which represented proceeds of drug trafficking.

950. On or about March 9, 2004, in Richmond, Virginia, Aaron Burton agreed to deposit \$1,000 in cash, which represented proceeds from cocaine and marijuana trafficking, into JACQUELINE STEWART's account at Connects Federal Credit Union so that JACQUELINE STEWART could make a mortgage payment.

951. On or about March 9, 2004, at the Credit Union Service Center, in Henrico County, Virginia, Aaron Burton deposited \$1,000 in cash, which represented proceeds of drug trafficking, into an account in the name of JACQUELINE STEWART.

952. On or about March 9, 2004, in Houston, Texas, JOE RODRIGUEZ called Aaron Burton in Henrico County, Virginia, to warn him that Norfolk homicide investigators were in Houston, Texas, looking for CHARLES VICKERY to interview him regarding the murder of Lionel Joyner.

953. On or about March 10, 2004, in Houston, Texas, RICARDO MANCHA sent a \$500 Western Union wire transfer to a co-conspirator in Dallas, Texas.

954. On or about March 10, 2004, in Houston, Texas, RICARDO MANCHA sent a \$300 Western Union wire transfer to LISA BAIRD in Theodore, Alabama.

955. On or about March 10, 2004, in Houston, Texas, JOE RODRIGUEZ called Aaron Burton in Chesterfield County, Virginia, to discuss the difficulties that he was having with importation of cocaine and marijuana into the United States from a source of supply in Mexico.

956. On or about March 11, 2004, in Richmond, Virginia, SEAN QUARLES possessed with intent to distribute a quantity of marijuana.

957. On or about March 11, 2004, in Houston, Texas, JOE RODRIGUEZ directed Aaron Burton in Hampton, Virginia, not have any contact with CHARLES VICKERY when CHARLES VICKERY travels to Norfolk, Virginia, to meet with Norfolk homicide investigators regarding the murder of Lionel Joyner.

958. On or about March 11, 2004, in Richmond, Virginia, Aaron Burton directed SEAN QUARLES to deliver a quantity of cash, which represented proceeds from cocaine and marijuana trafficking, to him at 3353 Meadowmont Lane, Henrico County, Virginia, the residence of JACQUELINE STEWART.

959. On or about March 11, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART delivered a quantity of cash, which represented proceeds from cocaine and marijuana trafficking, to Aaron Burton.

960. On or about March 12, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, SEAN QUARLES possessed with intent to distribute 36 grams of cocaine base and 36 grams of cocaine.

961. On or about March 13, 2004, in Houston, Texas, JOE RODRIGUEZ called Aaron Burton in Washington, D.C., to warn Aaron Burton that the Norfolk homicide investigators

might interview him regarding his knowledge of the murder of Lionel Joyner since CHARLES VICKERY had a valid Virginia driver's license listing the address of 222 Syms Street, Hampton, Virginia, as his residence.

962. On or about March 13, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART collected approximately \$1,000 in cash, which represented proceeds of drug trafficking, from a co-conspirator.

963. On or about March 14, 2004, in Houston, Texas, JOE RODRIGUEZ called Aaron Burton in Richmond, Virginia, to warn him that he should dispose of the marijuana that was storing for JOE RODRIGUEZ.

964. On or about March 14, 2004, in Richmond, Virginia, Aaron Burton asked JACQUELINE STEWART if she had collected a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator.

965. On or about March 14, 2004, in Richmond, Virginia, SEAN QUARLES called Aaron Burton at 3353 Meadowmont Lane, Richmond, Virginia, the residence of JACQUELINE STEWART, to request a quantity of cocaine for further redistribution.

966. On or about March 15, 2004, at 8206 Bonner Drive, in Houston, Texas, ELOISA QUINONES made arrangements for CHARLES VICKERY to fly from Houston, Texas, to Norfolk, Virginia, to meet with Norfolk homicide investigators regarding the murder of Lionel Joyner.

967. On or about March 15, 2004, in Houston, Texas, CHARLES VICKERY and JOE RODRIGUEZ met to discuss how to conceal the existence of the drug trafficking, money laundering, and importation conspiracies from the Norfolk homicide investigators during a pending interview of CHARLES VICKERY regarding the murder of Lionel Joyner.

968. On or about March 15, 2004, in Houston, Texas, JOE RODRIGUEZ took T-Mobile USA, Inc. pre-paid cellular/PCS telephone (832) 434-5240 from CHARLES VICKERY because of CHARLES VICKERY's pending interview by Norfolk homicide investigators regarding the murder of Lionel Joyner.

969. On or about March 15, 2004, in Houston, Texas, JOE RODRIGUEZ called Aaron Burton in Henrico County, Virginia, that he was changing his cellular telephone number because of the pending interview of CHARLES VICKERY by the Norfolk homicide investigators regarding the murder of Lionel Joyner.

970. On or about March 15, 2004, at T-Mobile USA, Inc., in Houston, Texas, JOE RODRIGUEZ, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service for himself with telephone number (832) 212-0687.

971. On or about March 15, 2004, in Houston, Texas, CHARLES VICKERY directed CHARLES VICKERY II, to deliver drug paraphernalia that belonged to JOE RODRIGUEZ to CHARLES VICKERY.

972. On or about March 15, 2004, in Houston, Texas, CHARLES VICKERY gave T-Mobile USA, Inc. cellular/PCS telephone (832) 868-7090 to CHARLES VICKERY, II, and CHARLES VICKERY began to use T-Mobile USA, Inc. cellular/PCS telephone (832) 573-0468 because of his pending interview by Norfolk homicide investigators regarding the murder of Lionel Joyner.

973. On or about March 16, 2004, in Baltimore, Maryland, CHARLES VICKERY called Aaron Burton in Chesterfield County, Virginia, to discuss CHARLES VICKERY traveling to Norfolk, Virginia, to be interviewed by Norfolk homicide investigators; his alibi

involving the murder of Lionel Joyner; his cover story for renting 222 Syms Street, Hampton, Virginia, and for Aaron Burton operating a vehicle in CHARLES VICKERY's name.

974. On or about March 16, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the collection of a quantity of cash, which represented proceeds from cocaine and marijuana trafficking.

975. On or about March 16, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, SEAN QUARLES delivered approximately \$2,500 in cash, which represented proceeds from cocaine and marijuana trafficking, to Aaron Burton.

976. On or about March 16, 2004, at 8206 Bonner Drive, in Houston, Texas, ELOISA QUINONES made arrangements for CHARLES VICKERY to fly from Norfolk, Virginia, to Houston, Texas, after being interviewed by Norfolk homicide investigators regarding the murder of Lionel Joyner.

977. On or about March 16, 2004, at 8206 Bonner Drive, in Houston, Texas, ELOISA QUINONES notified JOE RODRIGUEZ that CHARLES VICKERY was released by Norfolk homicide investigators after being interviewed about the murder of Lionel Joyner.

978. On or about March 16, 2004, in Houston, Texas, JOE RODRIGUEZ left a voice mail message on Aaron Burton's cellular telephone that CHARLES VICKERY was released by Norfolk homicide investigators after being interviewed about the murder of Lionel Joyner.

979. On or about March 17, 2004, in Houston, Texas, JOE RODRIGUEZ warned CHARLES VICKERY that even though he was not arrested for the murder of Lionel Joyner, he would be under surveillance by law enforcement for being involved in the distribution of cocaine and marijuana.

980. On or about March 17, 2004, in Richmond, Virginia, KIET TROUNG called Aaron Burton to discuss the purchase of a quantity of cocaine, cocaine base, and marijuana from Aaron Burton.

981. On or about March 17, 2004, at the Bellmeade Apartments, in Richmond, Virginia, KIET TROUNG purchased a quantity of cocaine and cocaine base for further redistribution from Aaron Burton.

982. On or about March 17, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART distributed a quantity of cocaine and marijuana to a co-conspirator.

983. On or about March 17, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART requested a quantity of cocaine from Aaron Burton for distribution to a co-conspirator and told Aaron Burton that if she was not home, he could leave the cocaine in a cabinet at her residence.

984. On or about March 17, 2004, in Richmond, Virginia, SEAN QUARLES and Aaron Burton discussed the quality of cocaine and cocaine base that SEAN QUARLES was distributing for Aaron Burton.

985. On or about March 18, 2004, in Richmond, Virginia, JOE RODRIGUEZ told Aaron Burton that he would have a supply of cocaine and marijuana delivered to Richmond, Virginia, within the next couple of days by RICHARD LESTER.

986. On or about March 18, 2004, in Richmond, Virginia, JOE RODRIGUEZ requested that Aaron Burton pay \$22,000 in cash, which represented proceeds of drug trafficking, to ROBERT DARR for the balance towards the purchase of a 2002 Chevrolet Corvette (VIN: 1G1YY32G525124514) and insurance on the vehicle.

987. On or about March 18, 2004, in Houston, Texas, JOE RODRIGUEZ called Aaron Burton in Richmond, Virginia, to obtain the telephone number of the Pomoco Auto Group in Newport News, Virginia, so that JOE RODRIGUEZ could contact ROBERT DARR.

988. On or about March 18, 2004, in Houston, Texas, JOE RODRIGUEZ told ROBERT DARR that Aaron Burton would be bringing \$22,000 in cash, which represented proceeds of drug trafficking, to him for the balance towards the purchase of a 2002 Chevrolet Corvette (VIN: 1G1YY32G525124514) and insurance on the vehicle.

989. On or about March 18, 2004, in Henrico County, Virginia, Aaron Burton collected a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

990. On or about March 18, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART possessed with intent to distribute a quantity of cocaine.

991. On or about March 19, 2004, in Houston, Texas, JOE RODRIGUEZ called Aaron Burton in Richmond, Virginia, to inquire as to whether Aaron Burton had delivered \$22,000 in cash, which represented proceeds of drug trafficking, to ROBERT DARR for the balance towards the purchase of a 2002 Chevrolet Corvette (VIN: 1G1YY32G525124514) and insurance on the vehicle.

992. On or about March 20, 2004, at Holly Springs Road and Hopkins Avenue, in Richmond, Virginia, SEAN QUARLES removed a quantity of cocaine from a 1987 Ford Taurus after being involved in an automobile accident and put the cocaine in a co-conspirator's vehicle to avoid detection of law enforcement.



993. On or about March 22, 2004, in Houston, Texas, CHARLES VICKERY, II, relayed a message to CHARLES VICKERY that RICHARD LESTER called for CHARLES VICKERY.

994. On or about March 22, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

995. On or about March 22, 2004, in Dallas, Texas, RICHARD LESTER delivered a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ.

996. On or about March 22, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the status of the collection of a quantity of cash, which represented proceeds of drug trafficking.

997. On or about March 22, 2004, in Dallas, Texas, RICARDO MANCHA informed JOE RODRIGUEZ that he had to change his cellular telephone number.

998. On or about March 22, 2004, in Henrico County, Virginia, SEAN QUARLES delivered a quantity of cash, which represented proceeds of drug trafficking, to Aaron Burton at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

999. On or about March 23, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART distributed a quantity of cocaine to a co-conspirator.

1000. On or about March 23, 2004, in Richmond, Virginia, SEAN QUARLES and Aaron Burton discussed the purchase price of cocaine and cocaine base for redistribution.

1001. On or about March 23, 2004, at the Mini-Price Self Storage, in Newport News, Virginia, Aaron Burton retrieved approximately \$22,000 in cash, which represented proceeds of drug trafficking, from a safe inside unit #9.

1002. On or about March 23, 2004, in Norfolk, Virginia, BRIAN MASON asked Aaron Burton for advice on how to "cook" cocaine into cocaine base.

1003. On or about March 23, 2004, in the parking lot of Pomoco Auto Group, in Newport News, Virginia, ROBERT DARR received approximately \$22,000 in cash, which represented proceeds of drug trafficking, in a bag from Aaron Burton on behalf of JOE RODRIGUEZ for a payment and insurance on a 2002 Chevrolet Corvette (VIN: 1G1YY32G525124514).

1004. On or about March 23, 2004, in the parking lot of Pomoco Auto Group, in Newport News, Virginia, ROBERT DARR and JOE RODRIGUEZ discussed on Aaron Burton's cellular telephone, the expiration date of a Virginia inspection sticker on a 2002 Chevrolet Corvette (VIN: 1G1YY32G525124514) registered to ROBERT DARR but driven by JOE RODRIGUEZ.

1005. On or about March 23, 2004, in Newport News, Virginia, CHARLES VICKERY II, provided Aaron Burton with CHARLES VICKERY's new cellular telephone number.

1006. On or about March 23, 2004, in Newport News, Virginia, CHARLES VICKERY and Aaron Burton discussed the difficulties that JOE RODRIGUEZ was having with the importation of cocaine and marijuana into the United States from a source of supply in Mexico and the development of a hydroponic marijuana growing operation in Houston, Texas, by CHARLES VICKERY.

1007. On or about March 23, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., sent a \$20 Western Union wire transfer to a co-conspirator in Merced, California.

1008. On or about March 23, 2004, in Houston, Texas, CHARLES VICKERY directed CHARLES VICKERY, II, to move a "big set of scales" from one trailer to another for use by CHARLES VICKERY and a co-conspirator.

1009. On or about March 23, 2004, in Norfolk, Virginia, LATARSHA GORE purchased a quantity of cocaine for further redistribution from Aaron Burton.

1010. On or about March 24, 2004, at T-Mobile USA, Inc., in Dallas, Texas, RICARDO MANCHA obtained cellular/PCS telephone service with telephone number (469) 479-3326 in a nominee name.

1011. On or about March 24, 2004, in Hampton, Virginia, JAMES SMALLWOOD asked Aaron Burton to inquire why JOHN MCBRIDE had not honored a three-year old agreement in which JOHN MCBRIDE was to make annual payments of \$30,000 to \$35,000 to JAMES SMALLWOOD in exchange for JAMES SMALLWOOD providing JOHN MCBRIDE with \$215,000 in cash, which represented proceeds of drug trafficking.

1012. On or about March 24, 2004, in Hampton, Virginia, JOHN MCBRIDE and Aaron Burton discussed JAMES SMALLWOOD calling Aaron Burton to inquire why JOHN MCBRIDE had not honored a three-year old agreement in which JOHN MCBRIDE was to make annual payments of \$30,000 to \$35,000 to JAMES SMALLWOOD in exchange for JAMES SMALLWOOD providing JOHN MCBRIDE with \$215,000 in cash, which represented proceeds of drug trafficking.

1013. On or about March 24, 2004, in Portsmouth, Virginia, LATARSHA GORE and Aaron Burton discussed the collection of a quantity of cash, which represented proceeds of drug trafficking, and the details on obtaining a quantity of cocaine from Aaron Burton.

1014. On or about March 24, 2004, in Henrico County, Virginia, Aaron Burton told JAMES SMALLWOOD that JOHN MCBRIDE would call him before March 26, 2004.

1015. On or about March 24, 2004, in Henrico County, Virginia, JAMES SMALLWOOD informed Aaron Burton that he may have a "big" cocaine transaction to conduct with Aaron Burton in the near future.

1016. On or about March 24, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine and the cost of transportation of the 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1017. On or about March 24, 2004, in Houston, Texas, CHARLES VICKERY while meeting with a co-conspirator to negotiate a drug transaction, possessed a firearm provided by CHARLES VICKERY, II.

1018. On or about March 24, 2004, in Houston, Texas, CHARLES VICKERY advised CHARLES VICKERY, II, that he left a firearm in the truck of a co-conspirator and that he used it for protection during a meeting with someone whom he did not know.

1019. On or about March 25, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1020. On or about March 25, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., provided his address of 6313 Sunnycrest Street, Houston, Texas, to JOE RODRIGUEZ so ROBERT DARR could mail a Virginia inspection sticker to JOE RODRIGUEZ.

1021. On or about March 25, 2004, in Norfolk, Virginia, BRIAN MASON asked Aaron Burton to supply him with a quantity of cocaine for further redistribution.

1022. On or about March 25, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, BRIAN MASON delivered approximately \$1,750 in cash, which represented proceeds of drug trafficking, to Aaron Burton and JACQUELINE STEWART.

1023. On or about March 25, 2004, in Lexington, Kentucky, RICHARD LESTER told JOE RODRIGUEZ about a vehicle that a co-conspirator has for sale that has a hidden compartment that would hold approximately 50 kilograms of cocaine.

1024. On or about March 25, 2004, in Houston, Texas, JOE RODRIGUEZ directed RICHARD LESTER not to have any contact with CHARLES VICKERY because of CHARLES VICKERY being interviewed by Norfolk homicide investigators regarding the murder of Lionel Joyner.

1025. On or about March 25, 2004, in Henrico County, Virginia, JAMES SMALLWOOD called Aaron Burton to set up a face-to-face meeting to discuss a potential cocaine transaction.

1026. On or about March 25, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the negotiations for transportation of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1027. On or about March 25, 2004, in Virginia Beach, Virginia, JARICE MASON told Aaron Burton that he had a quantity of cash, which represented proceeds from cocaine and marijuana trafficking, that was owed to Aaron Burton.

1028. On or about March 26, 2004, in Norfolk, Virginia, BRIAN MASON called Aaron Burton at JACQUELINE STEWART's residence at 3353 Meadowmont Lane, Henrico County, Virginia, to request a quantity of cocaine for further redistribution.

1029. On or about March 26, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the required importation documentation and the method of packing to avoid detection of law enforcement for a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1030. On or about March 26, 2004, in Houston, Texas, RICARDO MANCHA delivered a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ, who was driving a 1990 Chevrolet Suburban bearing Texas license plate 9XYT48.

1031. On or about March 26, 2004, in Henrico County, Virginia, JARICE MASON purchased a quantity of cocaine for further redistribution from Aaron Burton at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1032. On or about March 26, 2004, in Houston, Texas, RICHARDO MANCHA sent a \$1,000 Western Union wire transfer to a co-conspirator in Anderson, South Carolina.

1033. On or about March 26, 2004, in Richmond, Virginia, SEAN QUARLES and Aaron Burton discussed the collection of a quantity of cash, which represented proceeds of drug trafficking.

1034. On or about March 26, 2004, in Chesapeake, Virginia, JAMES SMALLWOOD and JOHN MCBRIDE agreed to meet on March 31, 2004, to discuss why JOHN MCBRIDE had not honored a three-year old agreement in which JOHN MCBRIDE was to make annual payments of \$30,000 to \$35,000 to JAMES SMALLWOOD in exchange for JAMES SMALLWOOD providing JOHN MCBRIDE with \$215,000 in cash, which represented proceeds of drug trafficking.

1035. On or about March 26, 2004, in Henrico County, Virginia, Aaron Burton distributed a quantity of marijuana to a co-conspirator at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1036. On or about March 27, 2004, in Lexington, Kentucky, RICHARD LESTER called JOE RODRIGUEZ in Houston, Texas, to advise him of the status of the collection of a quantity of cash, which represented proceeds of drug trafficking.

1037. On or about March 27, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART, at the direction of Aaron Burton, searched her residence for a lost quantity of cocaine base.

1038. On or about March 27, 2004, in Richmond, Virginia, Aaron Burton requested ANGELA CLARK to collect a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator.

1039. On or about March 27, 2004, in Richmond, Virginia, Aaron Burton called CHARLES VICKERY in Houston, Texas, to determine whether JOE RODRIGUEZ had obtained a supply of cocaine and marijuana and discussed the difficulties in contacting JOE RODRIGUEZ.

1040. On or about March 27, 2004, in Norfolk, Virginia, BRIAN MASON called Aaron Burton to order a quantity of cocaine and to notify Aaron Burton that he had approximately \$2,000 in cash, which represented proceeds from cocaine and marijuana trafficking.

1041. On or about March 27, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1042. On or about March 28, 2004, in Hampton, Virginia, JARICE MASON purchased a quantity of cocaine for further redistribution from Aaron Burton at 502 Marshall Street, the residence of ANGELA CLARK and MARCUS TAYLOR.

1043. On or about March 28, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1044. On or about March 29, 2004, in Norfolk, Virginia, BRIAN MASON called Aaron Burton to obtain a bogus address to represent as legitimate to his probation officer and Aaron Burton provided the name, JACQUELINE STEWART and her address as 3353 Meadowmont Lane, Richmond, Virginia.

1045. On or about March 29, 2004, in Richmond, Virginia, JAMES SMALLWOOD and Aaron Burton made arrangements for a face-to-face meeting to discuss a future cocaine transaction.

1046. On or about March 29, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., met with JOE RODRIGUEZ to discuss the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1047. On or about March 29, 2004, at the Rest Area on I-64, in New Kent County, Virginia, JAMES SMALLWOOD drove a 2003 BMW 745L bearing Virginia license plate 23DSONG (VIN: WBAGN63493DR08281) and met with Aaron Burton to negotiate a 20 kilogram cocaine transaction.

1048. On or about March 29, 2004, in Houston, Texas, JOE RODRIGUEZ provided T-Mobile USA, Inc. pre-paid cellular/PCS telephone (832) 860-7306 to LAZARO RAMIREZ, JR., to use.



1049. On or about March 29, 2004, in Richmond, Virginia, SEAN QUARLES possessed with intent to distribute a quantity of cocaine.

1050. On or about March 29, 2004, in Richmond, Virginia, SEAN QUARLES distributed a quantity of cocaine to a co-conspirator.

1051. On or about March 29, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the collection of a quantity of cash, which represented proceeds of drug trafficking.

1052. On or about March 30, 2004, in Houston, Texas, JOE RODRIGUEZ directed RICHARD LESTER not to have any contact with CHARLES VICKERY because he owed JOE RODRIGUEZ \$120,000 in cash, which represented proceeds of drug trafficking.

1053. On or about March 30, 2004, at the Eckerd's Pharmacy parking lot, at Jones Road and Fallbrook Drive, in Houston, Texas, LAZARO RAMIREZ, JR., met with JOE RODRIGUEZ to discuss the cost of transporting a shipment of 500 kilograms cocaine into the United States from a source of supply in Mexico.

1054. On or about March 30, 2004, in Richmond, Virginia, Aaron Burton called CHARLES VICKERY in Houston, Texas, to determine whether JOE RODRIGUEZ had obtained a supply of cocaine and marijuana and to discuss the difficulties in contacting JOE RODRIGUEZ.

1055. On or about March 31, 2004, in Hampton Roads, JOHN MCBRIDE agreed to start paying JAMES SMALLWOOD on a three-year old agreement in which JOHN MCBRIDE was to make annual payments of \$30,000 to \$35,000 to JAMES SMALLWOOD in exchange for JAMES SMALLWOOD providing JOHN MCBRIDE with \$215,000 in cash, which represented proceeds of drug trafficking.

1056. On or about March 31, 2004, in Lexington, Kentucky, RICHARD LESTER called JOE RODRIGUEZ in Houston, Texas, to advise him of the status of the collection of a quantity of cash, which represented proceeds of drug trafficking.

1057. On or about March 31, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1058. On or about March 31, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1059. On or about March 31, 2004, in Portsmouth, Virginia, LATARSHA GORE complained to Aaron Burton about the quality of cocaine that Aaron Burton had distributed to her on March 23, 2004.

1060. On or about March 31, 2004, in Henrico County, Virginia, JARICE MASON purchased a quantity of cocaine for further redistribution from Aaron Burton at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1061. On or about April 1, 2004, in Hampton Roads, MARCUS TAYLOR and a co-conspirator met to discuss the collection of a quantity of cash, which represented proceeds of drug trafficking.

1062. On or about April 1, 2004, at T-Mobile USA, Inc., in Lexington, Kentucky, RICHARD LESTER, under the alias name Mark Shepard, obtained pre-paid cellular/PCS telephone service with telephone numbers (615) 243-2249 and (214) 228-4962.

1063. On or about April 1, 2004, RICHARD LESTER traveled in a vehicle from Lexington, Kentucky, to Dallas, Texas, to deliver a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ.

1064. On or about April 1, 2004, in Lexington, Kentucky, RICHARD LESTER called JOE RODRIGUEZ in Houston, Texas, to advise him that CHARLES VICKERY called him to inquire about the status of a shipment of cocaine because Aaron Burton had called CHARLES VICKERY.

1065. On or about April 1, 2004, in Virginia Beach, Virginia, JARICE MASON and a co-conspirator discussed the quality of cocaine that Aaron Burton had distributed to JARICE MASON and the co-conspirator.

1066. On or about April 1, 2004, in Richmond, Virginia, KIET TRUONG told Aaron Burton he would be collecting a quantity of cash, which represented proceeds of drug trafficking, from his customers.

1067. On or about April 1, 2004, in Virginia Beach, Virginia, JARICE MASON called Aaron Burton to order two ounces of cocaine for further redistribution.

1068. On or about April 1, 2004, in Henrico County, Virginia, Aaron Burton called CHARLES VICKERY in Houston, Texas, to determine whether JOE RODRIGUEZ had obtained a supply of cocaine and marijuana and to discuss the difficulties in contacting JOE RODRIGUEZ.

1069. On or about April 2, 2004, in Hampton, Virginia, JARICE MASON purchased a quantity of cocaine for further redistribution from Aaron Burton at 502 Marshall Street, the residence of ANGELA CLARK and MARCUS TAYLOR.

1070. On or about April 2, 2004, at 2228 Greenwood Drive, in Portsmouth, Virginia, LATARSHA GORE delivered a quantity of cash, which represented proceeds of drug trafficking, to Aaron Burton.

1071. On or about April 2, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the status of the collection of cash which represented proceeds of drug trafficking.

1072. On or about April 2, 2004, in Dallas, Texas, RICHARD LESTER delivered a quantity of cash, which represented proceeds of drug trafficking, to JOE RODRIGUEZ.

1073. On or about April 2, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1074. On or about April 2, 2004, in Norfolk, Virginia, BRIAN MASON possessed with intent to distribute approximately four grams of cocaine base, scales, and \$530 in cash, which represented proceeds of drug trafficking.

1075. On or about April 2, 2004, in Commerce, Texas, RICHARD LESTER, under the alias name Mark Shepard, sent a \$920 Western Union wire transfer to a co-conspirator in Roma, Texas.

1076. On or about April 3, 2004, at 502 Marshall Street, in Hampton, Virginia, MARCUS TAYLOR collected a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator.

1077. On or about April 3, 2004, in Richmond, Virginia, KIET TRUONG ordered a quantity of cocaine and marijuana from Aaron Burton and agreed to meet at Aaron Burton's residence located at 11201 Kingfisher Terrace, in Chesterfield County, Virginia.

1078. On or about April 3, 2004, in Houston, Texas, JESUS CEBALLOS and JOE RODRIGUEZ met with a co-conspirator to negotiate a shipment of cocaine.

1079. On or about April 3, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, KIET TRUONG purchased a quantity of cocaine and marijuana for further redistribution from Aaron Burton.

1080. On or about April 3, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico and concerns about inspections at the border and aerial surveillance by law enforcement.

1081. On or about April 3, 2004, in Houston, Texas, JESUS CEBALLOS and JOE RODRIGUEZ discussed the negotiations involving a co-conspirator transporting a quantity of cocaine in exchange for a quantity of cocaine.

1082. On or about April 3, 2004, in Portsmouth, Virginia, LATARSHA GORE ordered a quantity of cocaine and cocaine base for redistribution from Aaron Burton.

1083. On or about April 3, 2004, at 502 Marshall Street, in Hampton, Virginia, MARCUS TAYLOR possessed with intent to distribute a quantity of marijuana.

1084. On or about April 3, 2004, in Richmond, Virginia, SEAN QUARLES distributed 28 grams of cocaine to a co-conspirator.

1085. On or about April 3, 2004, in Virginia Beach, Virginia, JARICE MASON and Aaron Burton agreed to meet at 502 Marshall Street, Hampton, Virginia, the residence of ANGELA CLARK and MARCUS TAYLOR, to discuss the arrest of BRIAN MASON; for JARICE MASON to deliver a quantity of cash, which represented proceeds from cocaine and

marijuana trafficking, to Aaron Burton; and for JARICE MASON to purchase a quantity of cocaine for further redistribution, from Aaron Burton.

1086. On or about April 4, 2004, in Hampton, Virginia, JARICE MASON purchased a quantity of cocaine for further redistribution from Aaron Burton and delivered a quantity of cash, which represented proceeds of drug trafficking, to Aaron Burton at 502 Marshall Street, the residence of ANGELA CLARK and MARCUS TAYLOR.

1087. On or about April 4, 2004, in Houston, Texas, JESUS CEBALLOS and JOE RODRIGUEZ discussed a shipment of cocaine.

1088. On or about April 4, 2004, in Norfolk, Virginia, LATARSHA GORE purchased a quantity of cocaine and cocaine base for further redistribution from Aaron Burton.

1089. On or about April 4, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1090. On or about April 5, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed some difficulties with the transportation of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1091. On or about April 5, 2004, in Portsmouth, Virginia, LATARSHA GORE informed Aaron Burton that she had distributed the cocaine and cocaine base that had previously distributed to her by Aaron Burton.

1092. On or about April 5, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the collection of a quantity of cash, which represented proceeds of drug trafficking.

1093. On or about April 5, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the difficulties that a source of supply in Mexico was having importing 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1094. On or about April 5, 2004, in Houston, Texas, JESUS CEBALLOS and JOE RODRIGUEZ discussed the status of a shipment of cocaine involving two different co-conspirators.

1095. On or about April 6, 2004, in Richmond, Virginia, SEAN QUARLES and Aaron Burton discussed the status of the collection of a quantity of cash, which represented proceeds of drug trafficking.

1096. On or about April 6, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1097. On or about April 6, 2004, in Chesterfield County, Virginia, Aaron Burton called CHARLES VICKERY in Houston, Texas, to determine whether JOE RODRIGUEZ had obtained a supply of cocaine and marijuana and to discuss the difficulties in contacting JOE RODRIGUEZ.

1098. On or about April 6, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1099. On or about April 6, 2004, in Houston, Texas, JESUS CEBALLOS negotiated a cocaine transaction with a co-conspirator.

1100. On or about April 6, 2004, in Houston, Texas, JESUS CEBALLOS called JOE RODRIGUEZ to inquire "what part of Virginia" did the shipment of cocaine need to be transported to and JOE RODRIGUEZ said, "The capitol, Richmond."

1101. On or about April 6, 2004, in Richmond, Virginia, Aaron Burton contacted a co-conspirator in Port St. Lucie, Florida, to determine whether the co-conspirator could supply him with a shipment of cocaine.

1102. On or about April 7, 2004, JESUS CEBALLOS and JOE RODRIGUEZ met with a co-conspirator to discuss the status of a shipment of cocaine.

1103. On or about April 7, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed methods of drug trafficking and money laundering.

1104. On or about April 7, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the status of the collection of a quantity of cash, which represented proceeds of drug trafficking.

1105. On or about April 7, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1106. On or about April 7, 2004, in Richmond, Virginia, SEAN QUARLES ordered a quantity of cocaine for further redistribution from Aaron Burton.

1107. On or about April 8, 2004, in Dallas, Texas, JOE RODRIGUEZ and JESUS CEBALLOS delivered a quantity of cash, which represented proceeds of drug trafficking, to RICARDO MANCHA.



1108. On or about April 8, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the collection of a quantity of cash, which represented proceeds of drug trafficking.

1109. On or about April 8, 2004, in Virginia Beach, Virginia, JARICE MASON and Aaron Burton discussed the availability of cocaine and cocaine base and the need for JARICE MASON to drive to Richmond, Virginia, to conduct the transaction with Aaron Burton.

1110. On or about April 8, 2004, in Portsmouth, Virginia, LATARSHA GORE advised Aaron Burton that she had to use some of the cash, which represented proceeds of drug trafficking, that she owed to Aaron Burton.

1111. On or about April 9, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1112. On or about April 9, 2004, in Houston, Texas, JOE RODRIGUEZ purchased \$100 worth of minutes for LAZARO RAMIREZ, JR.'s pre-paid T-Mobile USA, Inc. cellular telephone, (832) 860-7306.

1113. On or about April 9, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, Aaron Burton warned JACQUELINE STEWART and a co-conspirator about the arrest of two other co-conspirators on marijuana, cocaine, and heroin charges.

1114. On or about April 9, 2004, in Dallas, Texas, RICARDO MANCHA and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1115. On or about April 10, 2004, in Chesterfield County, Virginia, Aaron Burton called CHARLES VICKERY in Houston, Texas, to determine whether JOE RODRIGUEZ had

obtained a supply of cocaine and marijuana and to inquire as to whether LAZARO RAMIREZ, JR., could obtain a supply of cocaine and marijuana.

1116. On or about April 10, 2004, in Henrico County, Virginia, JARICE MASON purchased a quantity of cocaine for further redistribution from Aaron Burton at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1117. On or about April 10, 2004, in Richmond, Virginia, KIET TRUONG ordered a quantity of cocaine for further redistribution from Aaron Burton.

1118. On or about April 10, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1119. On or about April 11, 2004, in Richmond, Virginia, KIET TRUONG and Aaron Burton discussed the quantity of cocaine and marijuana that KIET TRUONG wanted to purchase from Aaron Burton and a location to meet to make the exchange.

1120. On or about April 11, 2004, at a Sheetz convenience store on Hull Street, in Richmond, Virginia, KIET TRUONG purchased a quantity of cocaine for further redistribution from Aaron Burton.

1121. On or about April 11, 2004, in Henrico County, Virginia, Aaron Burton met with a co-conspirator at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART, to discuss an alternative cocaine source.

1122. On or about April 11, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1123. On or about April 11, 2004, in Houston, Texas, JOE RODRIGUEZ called RICHARD LESTER in Dallas, Texas, to discuss the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1124. On or about April 11, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, SEAN QUARLES delivered a quantity of cash, which represented proceeds of drug trafficking, to Aaron Burton.

1125. On or about April 12, 2004, in Houston, Texas, JESUS CEBALLOS and JOE RODRIGUEZ discussed the status of a shipment of cocaine involving a co-conspirator from Houston, Texas, and a co-conspirator from Corpus Christi, Texas.

1126. On or about April 12, 2004, in Richmond, Virginia, TILLMON WOODSON inquired as to whether Aaron Burton had obtained a supply of cocaine.

1127. On or about April 12, 2004, in Virginia Beach, Virginia, JARICE MASON and Aaron Burton discussed the collection of a quantity of cash, which represented proceeds of drug trafficking.

1128. On or about April 12, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1129. On or about April 13, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed transportation routes for shipment of cocaine into the United States from a source of supply in Mexico and concerns about aerial surveillance by law enforcement.

1130. On or about April 13, 2004, in Chesapeake, Virginia, JOHN MCBRIDE and Aaron Burton discussed Aaron Burton's cocaine distribution methods and the activities of co-conspirators, SEAN QUARLES and Haywood Chavis.

1131. On or about April 13, 2004, JARICE MASON traveled from Virginia Beach, Virginia, to 502 Marshall Street, Hampton, Virginia, to meet with MARCUS TAYLOR.

1132. On or about April 13, 2004, at Chili's Restaurant, on W. Mercury Boulevard, in Hampton, Virginia, MARCUS TAYLOR and JARICE MASON delivered a quantity of cash, which represented proceeds from the sale of cocaine and marijuana, to Aaron Burton.

1133. On or about April 13, 2004, in Hampton, Virginia, Aaron Burton called JARICE MASON at 502 Marshall Street, Hampton, Virginia, the residence of ANGELA CLARK and MARCUS TAYLOR, to inquire whether there was any baking soda at the residence for "cooking" cocaine into cocaine base.

1134. On or about April 13, 2004, in Hampton, Virginia, Aaron Burton and a co-conspirator in New York, New York, agreed that Aaron Burton would travel to New York, New York, on April 15, 2004, so the co-conspirator could supply Aaron Burton with a shipment of cocaine.

1135. On or about April 13, 2004, in Hampton, Virginia, Aaron Burton "cooked" a quantity of cocaine into cocaine base for distribution to JARICE MASON at 502 Marshall Street, the residence of ANGELA CLARK and MARCUS TAYLOR.

1136. On or about April 13, 2004, in Virginia Beach, Virginia, JARICE MASON ordered two ounces of cocaine for further redistribution from Aaron Burton and complimented Aaron Burton on the good quality of the cocaine that Aaron Burton had just distributed to him.

1137. On or about April 13, 2004, in Henrico County, Virginia, Aaron Burton collected a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1138. On or about April 14, 2004, in Houston, Texas, JOE RODRIGUEZ and RICARDO MANCHA discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1139. On or about April 14, 2004, in Richmond, Virginia, SEAN QUARLES called Aaron Burton to obtain the name of the fictitious company, Burton Concrete Company, for employment verification purposes and Aaron Burton told SEAN QUARLES to use JACQUELINE STEWART's telephone number as a contact for Burton Concrete Company.

1140. On or about April 14, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, Aaron Burton called JACQUELINE STEWART to direct her to verify the false employment of SEAN QUARLES with the fictitious company, Burton Concrete Company.

1141. On or about April 14, 2004, at Taquerias Mexico, 401 Winkler Drive, in Houston, Texas, JESUS CEBALLOS met with two co-conspirators to discuss the status of a shipment of cocaine.

1142. On or about April 14, 2004, in Lexington, Kentucky, a co-conspirator at the direction of RICHARD LESTER sent a \$920 Western Union wire transfer to a co-conspirator in Houston, Texas.

1143. On or about April 14, 2004, in Lexington, Kentucky, a co-conspirator at the direction of RICHARD LESTER sent a \$920 Western Union wire transfer to another co-conspirator in Dallas, Texas.

1144. On or about April 14, 2004, at 6600 Hull Street Road, in Chesterfield County, Virginia, Haywood Chavis possessed with intent to distribute approximately 28 grams of cocaine base and approximately 1.5 grams of heroin, a set of digital scales, and \$700 in cash, which represented proceeds of drug trafficking.

1145. On or about April 15, 2004, in Henrico County, Virginia, Aaron Burton provided the address of JACQUELINE STEWART at 3353 Meadowmont Lane, Richmond, Virginia, as his residence to a representative from T-Mobile even though Aaron Burton did not reside there.

1146. On or about April 15, 2004, in Henrico County, Virginia, TILLMON WOODSON and Aaron Burton met at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART, to discuss an alternative source for cocaine in Richmond, Virginia.

1147. On or about April 15, 2004, in Houston, Texas, JOE RODRIGUEZ called RICHARD LESTER to discuss the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1148. On or about April 15, 2004, in Henrico County, Virginia, Haywood Chavis called Aaron Burton from 3353 Meadowmont Lane, the residence of JACQUELINE STEWART, to advise Aaron Burton of his arrest on cocaine and heroin charges on April 14, 2004.

1149. On or about April 15, 2004, in Houston, Texas, JOE RODRIGUEZ and RICARDO MANCHA discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1150. On or about April 15, 2004, Aaron Burton traveled from Hampton, Virginia, to 3353 Meadowmont Lane, Henrico County, Virginia, the residence of JACQUELINE STEWART, to meet with Haywood Chavis to discuss Haywood Chavis' arrest and his plans for fleeing the area.

1151. On or about April 15, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1152. On or about April 15, 2004, in Newport News, Virginia, a co-conspirator in New York, New York, left a voice mail message on Aaron Burton's cellular telephone to determine why Aaron Burton did not show up in New York, New York, as previously agreed upon.

1153. On or about April 16, 2004, at Five Star Auto Rental, in Norfolk, Virginia, BRIAN MASON leased a 1995 Chevrolet Corsica bearing Virginia license plate YAU-8545 for \$178.79 in cash, which represented proceeds of drug trafficking.

1154. On or about April 16, 2004, in Richmond, Virginia, Aaron Burton directed JACQUELINE STEWART to locate a rental vehicle for him to travel to New York, New York.

1155. On or about April 16, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, SEAN QUARLES possessed with intent to distribute a quantity of cocaine.

1156. On or about April 16, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1157. On or about April 17, 2004, in Houston, Texas, JOE RODRIGUEZ and RICARDO MANCHA discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1158. On or about April 17, 2004, at the Mini-Price Self Storage, in Newport News, Virginia, Aaron Burton retrieved approximately \$130,000 in cash, which represented proceeds of drug trafficking, from a safe inside unit #9.

1159. On or about April 17, 2004, in Newport News, Virginia, Aaron Burton called a co-conspirator in New York, New York, and they agreed that Aaron Burton would travel to New York, New York, later in the day to negotiate a transaction.

1160. On or about April 17, 2004, in Richmond, Virginia, Aaron Burton called JACQUELINE STEWART and TILLMON WOODSON trying to find someone to take him to the Richmond International Airport so that Aaron Burton could obtain a rental vehicle to drive to New York, New York, to make arrangements to obtain a quantity of cocaine.

1161. On or about April 17, 2004, in Houston, Texas, JESUS CEBALLOS and JOE RODRIGUEZ discussed the status of a shipment of cocaine.

1162. On or about April 17, 2004, in Houston, Texas, LAZARO RAMIREZ, JR., and JOE RODRIGUEZ met to discuss their concerns about a possible government informant.

1163. On or about April 17, 2004, in Richmond, Virginia, TILLMON WOODSON drove Aaron Burton to the Richmond International Airport so that Aaron Burton could obtain a rental vehicle to be to drive to New York, New York, to make arrangements to obtain a quantity of cocaine.

1164. On or about April 17, 2004, in Cecil County, Maryland, Aaron Burton possessed \$137,720 in cash, which represented proceeds of drug trafficking, and a Glock 9mm pistol that he was transporting to New York, New York.

1165. On or about April 18, 2004, in Houston, Texas, JOE RODRIGUEZ contacted a co-conspirator to have the co-conspirator try to find out information about a law enforcement investigation involving JOE RODRIGUEZ and LAZARO RAMIREZ, JR.

1166. On or about April 19, 2004, in Houston, Texas, JOE RODRIGUEZ and RICARDO MANCHA discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.



1167. On or about April 19, 2004, in Houston, Texas, JOE RODRIGUEZ gave LAZARO RAMIREZ, JR., advice on how to handle meeting with a possible government informant who may have a concealed recording device.

1168. On or about April 19, 2004, in Richmond, Virginia, TILLMON WOODSON called Aaron Burton to advise him that Haywood Chavis had been arrested.

1169. On or about April 20, 2004, in Nashville, Tennessee, RICHARD LESTER mailed or caused to be mailed a wooden crate containing approximately 240 pounds of marijuana from Phoenix, Arizona, to Central Freight in Nashville, Tennessee.

1170. On or about April 20, 2004, in Houston, Texas, JOE RODRIGUEZ gave LAZARO RAMIREZ, JR., advice on how to conduct counter-surveillance of a meeting with a possible government informant who may have a concealed recording device.

1171. On or about April 20, 2004, in Houston, Texas, JOE RODRIGUEZ directed LAZARO RAMIREZ, JR., to change cellular telephones because of their dealings with a possible government informant.

1172. On or about April 20, 2004, in Richmond, Virginia, Aaron Burton directed Haywood Chavis, who was a fugitive from justice, to call him later at JACQUELINE STEWART's residence or on JACQUELINE STEWART's cellular telephone.

1173. On or about April 20, 2004, in Nashville, Tennessee, RICHARD LESTER called JOE RODRIGUEZ to discuss the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1174. On or about April 21, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART received a letter for Aaron Burton that was mailed from a co-conspirator, who was incarcerated.

1175. On or about April 22, 2004, in Richmond, Virginia, KIET TRUONG inquired of Aaron Burton as to whether he had received a shipment of cocaine and marijuana.

1176. On or about April 22, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the quality of cocaine being offered by an alternative source in Richmond, Virginia.

1177. On or about April 22, 2004, at Central Freight at 733 Massman Drive, in Nashville, Tennessee, RICHARD LESTER, presenting himself as Mark Shepard picked up a wooden crate that had been shipped from Phoenix, Arizona, believing that the wooden crate contained approximately 240 pounds of marijuana.

1178. On or about April 22, 2004, in Richmond, Virginia, SEAN QUARLES delivered a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator to Aaron Burton.

1179. On or about April 23, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, SEAN QUARLES delivered a quantity of cash, which represented proceeds of drug trafficking, to Aaron Burton.

1180. On or about April 23, 2004, at the Mini-Price Self Storage, in Newport News, Virginia, Aaron Burton possessed approximately \$2,129,800 in cash, which represented proceeds of drug trafficking, inside unit #9 and removed approximately \$100,000 in cash to purchase four kilograms of cocaine from TILLMON WOODSON.

1181. On or about April 24, 2004, in Houston, Texas, JESUS CEBALLOS and JOE RODRIGUEZ discussed the status of a shipment of cocaine.

1182. On or about April 24, 2004, in Houston, Texas, JOE RODRIGUEZ and RICARDO MANCHA discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1183. On or about April 25, 2004, in Richmond, Virginia, SEAN QUARLES and Aaron Burton discussed problems he was having collecting a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator.

1184. On or about April 25, 2004, at 813 Sharpley Avenue, in Hampton, Virginia, ANGELA CLARK collected mail for Aaron Burton.

1185. On or about April 26, 2004, at T-Mobile USA, Inc., in Houston, Texas, JESUS CEBALLOS, without using a name but using a false date of birth, obtained pre-paid cellular/PCS telephone service with telephone number (713) 298-5190.

1186. On or about April 26, 2004, JARICE MASON traveled from Virginia Beach, Virginia, to New York, New York, to locate an alternative cocaine source to Aaron Burton.

1187. On or about April 26, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, TILLMON WOODSON received \$100,000 in cash, which represented proceeds of drug trafficking, from Aaron Burton to purchase four kilograms of cocaine.

1188. On or about April 26, 2004, in Richmond, Virginia, TILLMON WOODSON purchased four kilograms of cocaine from a co-conspirator with \$100,000 in cash, which represented proceeds of drug trafficking, that he obtained from Aaron Burton.

1189. On or about April 26, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, TILLMON WOODSON delivered four kilograms of cocaine to Aaron Burton in a 2001 Jeep Cherokee bearing Virginia license plate ZDU-4607 (VIN: 1J4GX48SX1C594260) and kept one kilogram of cocaine for further redistribution.

1190. On or about April 26, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, Aaron Burton asked JACQUELINE STEWART for baking soda and directed her to obtain some baking soda so that Aaron Burton could "cook" cocaine into cocaine base for distribution to a co-conspirator at 3353 Meadowmont Lane, Henrico County, Virginia.

1191. On or about April 27, 2004, in New York, New York, JARICE MASON called Aaron Burton, in Henrico County, Virginia, to discuss the robbery of all of his money by drug dealers in New York, New York.

1192. On or about April 27, 2004, at 813 Sharpley Avenue, in Hampton, Virginia, ANGELA CLARK collected mail for Aaron Burton.

1193. On or about April 28, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the quality of the cocaine that was purchased two days earlier from a co-conspirator in Richmond, Virginia.

1194. On or about April 28, 2004, in Richmond, Virginia, Aaron Burton directed MARCUS TAYLOR to give \$100 in cash, which represented proceeds of drug trafficking, to an individual.

1195. On or about April 29, 2004, in Henrico County, Virginia, JARICE MASON purchased a quantity of cocaine for further redistribution from Aaron Burton at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1196. On or about April 29, 2004, in Houston, Texas, JOE RODRIGUEZ and RICARDO MANCHA discussed the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1197. On or about April 29, 2004, in Richmond, Virginia, Aaron Burton directed JACQUELINE STEWART to contact Haywood Chavis, who was a fugitive from justice, in order to ascertain Haywood Chavis' whereabouts.

1198. On or about April 29, 2004, in Virginia Beach, Virginia, JARICE MASON told Aaron Burton that he had distributed most of the cocaine and ordered a quantity of cocaine base.

1199. On or about April 29, 2004, in Newport News, Virginia, Aaron Burton called a family member to inquire as to whether there was baking soda at 502 Marshall Street, Hampton, Virginia, for "cooking" cocaine into cocaine base and the whereabouts of MARCUS TAYLOR.

1200. On or about April 29, 2004, at Target, in Hampton, Virginia, Aaron Burton purchased baking soda to "cook" cocaine into cocaine base for further distribution to JARICE MASON by MARCUS TAYLOR.

1201. On or about April 29, 2004, Aaron Burton drove to 502 Marshall Street, the residence of ANGELA CLARK and MARCUS TAYLOR, to "cook" cocaine into cocaine base for further distribution to JARICE MASON by MARCUS TAYLOR.

1202. On or about April 30, 2004, in Houston, Texas, JOE RODRIGUEZ and LAZARO RAMIREZ, JR., discussed switching "chips" in cellular telephones.

1203. On or about April 30, 2004, in Virginia Beach, Virginia, JARICE MASON called Aaron Burton to order a quantity of cocaine and Aaron Burton directed JARICE MASON to call MARCUS TAYLOR on ANGELA CLARK's cellular telephone to find out the "particulars."

1204. On or about April 30, 2004, in Virginia Beach, Virginia, JARICE MASON collected a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator.

1205. On or about April 30, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, Sean Quarles delivered a quantity of cash, which represented proceeds of drug trafficking, to Aaron Burton.

1206. On or about April 30, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed having a co-conspirator in Dallas, Texas, send \$4,000 through Western Union to Mexico to "pay the soldiers here" to allow couriers to cross the United States/Mexico border.

1207. On or about April 30, 2004, in Richmond, Virginia, JACQUELINE STEWART notified Aaron Burton to contact a co-conspirator regarding the collection of a quantity of cash, which represented proceeds of drug trafficking.

1208. On or about May 1, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the cost of kilograms of cocaine being offered by a co-conspirator in New York.

1209. On or about May 1, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the fugitive status of Haywood Chavis and the collection of a quantity of cash by Aaron Burton and Haywood Chavis from co-conspirators.

1210. On or about May 3, 2004, in Virginia Beach, Virginia, JARICE MASON informed Aaron Burton that he was going to pick up a quantity of cocaine from MARCUS TAYLOR and deliver a quantity of cash, which represented proceeds of drug trafficking, to MARCUS TAYLOR at 502 Marshall Street, Hampton, Virginia, the residence of MARCUS TAYLOR and ANGELA CLARK.

1211. On or about May 3, 2004, in Richmond, Virginia, Aaron Burton directed MARCUS TAYLOR to collect approximately \$1,500 in cash, which represented proceeds from

cocaine and marijuana trafficking, from JARICE MASON and to distribute one ounce of cocaine to JARICE MASON.

1212. On or about May 3, 2004, at 502 Marshall Street, Hampton, Virginia, MARCUS TAYLOR possessed with intent to distribute a quantity of cocaine.

1213. On or about May 4, 2004, in Richmond, Virginia, JACQUELINE STEWART notified Aaron Burton to contact a co-conspirator regarding the collection of a quantity of cash, which represented proceeds of drug trafficking.

1214. On or about May 4, 2004, in Houston, Texas, JOE RODRIGUEZ requested a quantity of marijuana from a source of supply in Mexico.

1215. On or about May 4, 2004, in Richmond, Virginia, KIET TRUONG and Aaron Burton discussed a co-conspirator's attempt to locate another source of cocaine.

1216. On or about May 5, 2004, in Richmond, Virginia, Aaron Burton directed a co-conspirator to deliver a quantity of cash, which represented proceeds of drug trafficking, to MARCUS TAYLOR or ANGELA CLARK.

1217. On or about May 5, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed the fugitive status of Haywood Chavis and methods of avoiding government informants.

1218. On or about May 5, 2004, in Henrico County, JARICE MASON delivered approximately \$6,000 in cash, which represented proceeds from cocaine and marijuana trafficking, to Aaron Burton at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1219. On or about May 6, 2004, in Virginia Beach, Virginia, JARICE MASON told Aaron Burton that he was going to deliver a quantity of cash, which represented proceeds of drug trafficking, to MARCUS TAYLOR at 502 Marshall Street, Hampton, Virginia.

1220. On or about May 6, 2004, in Henrico County, Virginia, Aaron Burton collected a quantity of cash, which represented proceeds of drug trafficking, from a co-conspirator at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1221. On or about May 7, 2004, at Five Star Auto Rental, in Norfolk, Virginia, BRIAN MASON leased a 1995 Chevrolet Corsica bearing Virginia license number YAU-8545 for \$992.77 in cash, which represented proceeds of drug trafficking.

1222. On or about May 7, 2004, in Houston, Texas, JOE RODRIGUEZ switched cellular/PCS telephones from T-Mobile USA, Inc. pre-paid cellular/PCS telephone (832) 212-0687 to T-Mobile USA, Inc. pre-paid cellular/PCS telephone (832) 434-5240.

1223. On or about May 7, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed CHARLES VICKERY "staying low key" because JOE RODRIGUEZ's fear that CHARLES VICKERY might be arrested by law enforcement.

1224. On or about May 7, 2004, in Houston, Texas, JOE RODRIGUEZ called RICHARD LESTER to discuss the status of a shipment of 500 kilograms of cocaine into the United States from a source of supply in Mexico.

1225. On or about May 7, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the quality, transportation costs, profit, and turnaround time for the distribution of a shipment of approximately 1000 pounds of marijuana.



1226. On or about May 7, 2004, in Richmond, Virginia, JACQUELINE STEWART and Aaron Burton discussed the schedule of distribution of marijuana to a co-conspirator and the collection of cash, which represented proceeds of drug trafficking.

1227. On or about May 7, 2004, at 7407 Dell Street, in Chesterfield, Virginia, Aaron Burton and KIET TRUONG met to discuss the collection of a quantity of cash, which represented proceeds of drug trafficking.

1228. On or about May 7, 2004, in Richmond, Virginia, Aaron Burton directed MARCUS TAYLOR to contact JARICE MASON to collect a quantity of cash, which represented proceeds of drug trafficking.

1229. On or about May 7, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton discussed whether or not Aaron Burton's cellular telephone number and name appear on Caller ID.

1230. On or about May 8, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the transportation of a quantity of marijuana to New Orleans, Louisiana, and the quality of approximately 400 pounds of marijuana in storage.

1231. On or about May 8, 2004, in Richmond, Virginia, KIET TRUONG asked Aaron Burton as to whether or not Aaron Burton had contacted a co-conspirator about the purchase of a quantity of cocaine.

1232. On or about May 9, 2004, in Richmond, Virginia, Aaron Burton called ANGELA CLARK to inquire as to whether MARCUS TAYLOR had met with JARICE MASON to collect a quantity of cash, which represented proceeds from cocaine and marijuana trafficking.

1233. On or about May 9, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed having RICARDO MANCHA and LISA BAIRD transport a

quantity of marijuana to St. Louis, Missouri, and the source of supply in Mexico requested JOE RODRIGUEZ send him some money through Western Union.

1234. On or about May 9, 2004, at 2228 Greenwood Drive, in Portsmouth, Virginia, Aaron Burton met with LATARSHA GORE.

1235. On or about May 10, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, JACQUELINE STEWART called Aaron Burton at 11201 Kingfisher Terrace, Chesterfield County, Virginia, to tell him that JOE RODRIGUEZ called her and left his telephone number.

1236. On or about May 10, 2004, Aaron Burton traveled from 11201 Kingfisher Terrace, Chesterfield County, Virginia, to 3353 Meadowmont Lane, Henrico County, Virginia, the residence of JACQUELINE STEWART, to retrieve the message left from JOE RODRIGUEZ.

1237. On or about May 10, 2004, Aaron Burton traveled from 3353 Meadowmont Drive, Henrico County, Virginia, to Wyndham Hotel, 4700 Laburnum Avenue, Henrico County, Virginia, to call JOE RODRIGUEZ from a pay telephone.

1238. On or about May 10, 2004, at the Blue & Gray Self Storage, in Chesterfield County, Virginia, Aaron Burton possessed with intent to distribute approximately 200 pounds of marijuana inside unit #B25-96.

1239. On or about May 10, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, Aaron Burton agreed to deposit \$1,000 in cash, which represented proceeds from cocaine and marijuana trafficking, into JACQUELINE STEWART's account at Connects Federal Credit Union so that JACQUELINE STEWART could make a mortgage payment.

1240. On or about May 10, 2004, at 502 Marshall Street, in Hampton, Virginia, MARCUS TAYLOR and Aaron Burton discussed the distribution of cocaine to JARICE MASON and the collection of approximately \$2,500 in cash, which represented proceeds from cocaine and marijuana trafficking, from JARICE MASON.

1241. On or about May 10, 2004, at 502 Marshall Street, in Hampton, Virginia, MARCUS TAYLOR possessed with intent to distribute a quantity of cocaine.

1242. On or about May 10, 2004, in Richmond, Virginia, Aaron Burton directed ANGELA CLARK to call the jails in Virginia Beach and Norfolk, Virginia, in an attempt to locate JARICE MASON.

1243. On or about May 10, 2004, in Richmond, Virginia, KIET TRUONG told Aaron Burton that he was distributing cocaine in Prince William County, Virginia.

1244. On or about May 11, 2004, at 1916 Rose Avenue, in Richmond, Virginia, Aaron Burton met with TILLMON WOODSON.

1245. On or about May 11, 2004, in Richmond, Virginia, Aaron Burton agreed to deposit \$1,000 in cash, which represented proceeds from cocaine and marijuana trafficking, into JACQUELINE STEWART's account at Connects Federal Credit Union so that JACQUELINE STEWART could make a mortgage payment.

1246. On or about May 11, 2004, at the Credit Union Service Center, in Henrico County, Virginia, Aaron Burton deposited \$1,000 in cash, which represented proceeds of drug trafficking, into a Connects Federal Credit Union account in the name of JACQUELINE STEWART.

1247. On or about May 11, 2004, in Henrico County, Virginia, ANGELA CLARK obtained \$75 in cash, which represented proceeds from cocaine and marijuana trafficking, from Aaron Burton at 3353 Meadowmont Lane, the residence of JACQUELINE STEWART.

1248. On or about May 11, 2004, in Richmond, Virginia, TILLMON WOODSON and Aaron Burton agreed to meet at 3353 Meadowmont Lane, Henrico County, Virginia, the residence of JACQUELINE STEWART.

1249. On or about May 12, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the transportation of a quantity of marijuana to New Orleans, Louisiana.

1250. On or about May 12, 2004, in Richmond, Virginia, KIET TRUONG told Aaron Burton that he had not collected the quantity of cash, which represented proceeds of drug trafficking, owed to him by other co-conspirators.

1251. On or about May 12, 2004, at the Mini-Price Self Storage, in Newport News, Virginia, Aaron Burton possessed with intent to distribute approximately three ounces of cocaine; approximately one ounce of cocaine base; approximately one pound of marijuana; digital scales; \$48,407 in cash, which represented proceeds of drug trafficking; and three cellular/PCS telephones with the names and telephone numbers of co-conspirators, including: Haywood Chavis, JOHN MCBRIDE, SEAN QUARLES, JOE RODRIGUEZ, JAMES SMALLWOOD, JACQUELINE STEWART, CHARLES VICKERY, CHARLES VICKERY II, and KIET TRUONG stored in their memories.

1252. On or about May 12, 2004, at 502 Marshall Street, in Hampton, Virginia, Aaron Burton maintained drug records reflecting amounts owed from BRIAN MASON, JARICE

MASON, LATARSHA GORE, JOHN MCBRIDE, SEAN QUARLES, MARCUS TAYLOR, Haywood Chavis, and other co-conspirators.

1253. On or about May 13, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the transportation of a quantity of marijuana to New Orleans, Louisiana.

1254. On or about May 15, 2004, in Houston, Texas, JOE RODRIGUEZ told a source of supply in Mexico that he would be traveling to New Orleans, Louisiana, to make arrangements for the delivery of a quantity of marijuana.

1255. On or about May 17, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the transportation to and distribution of marijuana in New Orleans, Louisiana; in Hampton, Virginia; Cincinnati, Ohio; and St. Louis, Missouri, by RICARDO MANCHA.

1256. On or about May 18, 2004, in Houston, Texas, JOE RODRIGUEZ told a source of supply in Mexico that he was traveling to New Orleans, Louisiana; to finalize negotiations for a 1000 pound marijuana transaction with two co-conspirators.

1257. On or about May 19, 2004, JOE RODRIGUEZ traveled via Southwest Airlines from Houston, Texas, to New Orleans, Louisiana, to negotiate a 1000 pound marijuana transaction with two co-conspirators.

1258. On or about May 19, 2004, in New Orleans, Louisiana, JOE RODRIGUEZ met with two co-conspirators to negotiate a 1000 pound marijuana transaction.

1259. On or about May 19, 2004, JOE RODRIGUEZ traveled via Southwest Airlines from New Orleans, Louisiana, to Houston, Texas.

1260. On or about May 20, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed a shipment of 1000 pounds of marijuana to two co-conspirators in New Orleans, Louisiana.

1261. On or about May 22, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed a shipment of 1000 pounds of marijuana to two co-conspirators in New Orleans, Louisiana, and a possible shipment of a quantity of marijuana to St. Louis, Missouri.

1262. On or about May 25, 2004, in Houston, Texas, JOE RODRIGUEZ and RICARDO MANCHA discussed travel plans to New Orleans, Louisiana.

1263. On or about May 26, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed changing cellular/PCS telephone numbers because of JOE RODRIGUEZ's concern that his cellular/PCS telephone was the subject of a law enforcement wiretap.

1264. On or about May 26, 2004, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone numbers (832) 656-8627 and (832) 721-6767 in his own name, with a billing address of 6313 Sunnycrest Street, Houston, Texas, the residence of LAZARO RAMIREZ, JR.

1265. On or about May 27, 2004, at Pagetel, in Houston, Texas, JOE RODRIGUEZ contacted a co-conspirator about "dumping" the cellular/PCS telephones that he had just purchased.

1266. On or about May 29, 2004, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ terminated cellular/PCS service with telephone number (832) 656-8627 because of law enforcement's contact with Sprint PCS.

1267. On or about May 29, 2004, at Sprint PCS, in Houston, Texas, JOE RODRIGUEZ obtained cellular/PCS telephone service with telephone number (832) 338-2291 in his own name, with a billing address of 6313 Sunnycrest Street, Houston, Texas, the residence of LAZARO RAMIREZ, JR.

1268. On or about June 2, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1269. On or about June 2, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1270. On or about June 2, 2004, in Houston Texas, a source of supply in Mexico directed JOE RODRIGUEZ to purchase some pre-paid telephone calling cards.

1271. On or about June 3, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the cost of transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1272. On or about June 4, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1273. On or about June 7, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the quality of approximately 300 pounds of marijuana that was to be transported from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1274. On or about June 8, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the quality of approximately 300 pounds of marijuana that was to be transported from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1275. On or about June 8, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1276. On or about June 9, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1277. On or about June 10, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the cost of transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD and a debt owed to the source of supply in Mexico by RICHARD LESTER.

1278. On or about June 10, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the cost of transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD and that the source of supply may send a quantity of marijuana to Gary, Indiana.

1279. On or about June 11, 2004, in Dallas, Texas, RICARDO MANCHA told a source of supply in Mexico that he was going to rent a vehicle for transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.



1280. On or about June 11, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1281. On or about June 11, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the status of transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1282. On or about June 11, 2004, RICARDO MANCHA traveled in a rental vehicle from Dallas, Texas, to Lexington, Kentucky, to meet with LISA BAIRD and pick up approximately 300 pounds of marijuana for transportation to St. Louis, Missouri.

1283. On or about June 11, 2004, LISA BAIRD traveled in a 2003 Ford Econoline van bearing North Carolina license plates CH-1406 (VIN: 1FTSS34F63HB69352) from Charlotte, North Carolina, to Lexington, Kentucky, to meet with RICARDO MANCHA and pick up approximately 300 pounds of marijuana for transportation to St. Louis, Missouri.

1284. On or about June 12, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the status of transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1285. On or about June 12, 2004, in Tennessee, RICARDO MANCHA and a source of supply in Mexico discussed the status of transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1286. On or about June 13, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the status of transportation of approximately 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1287. On or about June 13, 2004, in Lexington, Kentucky, RICARDO MANCHA and a source of supply in Mexico discussed the loading procedures of approximately 300 pounds of marijuana to be transported from Lexington, Kentucky, to St. Louis, Missouri, by RICARDO MANCHA and LISA BAIRD.

1288. On or about June 13, 2004, LISA BAIRD and RICARDO MANCHA transported approximately 300 pounds of marijuana in a 2003 Ford Econoline van bearing North Carolina license plates CH-1406 (VIN: 1FTSS34F63HB69352) from Lexington, Kentucky, to St. Louis, Missouri.

1289. On or about June 13, 2004, at 8:59 p.m., in St. Louis, Missouri, RICARDO MANCHA telephoned a source of supply in Mexico to tell the source of supply in Mexico that he and LISA BAIRD had arrived in St. Louis, Missouri, with approximately 300 pounds of marijuana.

1290. On or about June 13, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the arrival of RICARDO MANCHA and LISA BAIRD in St. Louis, Missouri, with approximately 300 pounds of marijuana.

1291. On or about June 14, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the activities of RICARDO MANCHA and LISA BAIRD, while in St. Louis, Missouri, after delivering approximately 300 pounds of marijuana.

1292. On or about June 15, 2004, in Dallas, Texas, RICARDO MANCHA agreed with a source of supply in Mexico to ask LISA BAIRD to transport another 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri.

1293. On or about June 17, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the availability of LISA BAIRD to transport another 300 pounds of marijuana from Lexington, Kentucky, to St. Louis, Missouri.

1294. On or about June 22, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the costs for RICARDO MANCHA and LISA BAIRD to transport a quantity of controlled substances from Los Angeles, California, to Norfolk, Virginia, the traveling routes, the distance and time it would take to drive the trip, and the location of weigh stations and check points.

1295. On or about June 23, 2004, in Houston, Texas, a source of supply in Mexico asked JOE RODRIGUEZ to have a co-conspirator transport a quantity of cash to Mexico.

1296. On or about June 23, 2004, at 15313 Gulf Freeway, in Houston, Texas, JOE RODRIGUEZ delivered approximately \$39,900 in cash, which represented proceeds of drug trafficking, to a co-conspirator for transportation to a source of supply in Mexico.

1297. On or about June 23, 2004, in Fort Bend County, Texas, two co-conspirators possessed approximately \$39,900 in cash, which represented proceeds of drug trafficking, while transporting the cash to Mexico.

1298. On or about June 23, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed that a co-conspirator had been stopped by law enforcement while transporting cash that was strapped on the body of another co-conspirator.

1299. On or about June 24, 2004, in Houston, Texas, JOE RODRIGUEZ and a source of supply in Mexico discussed the law enforcement seizure of \$39,900 in cash, which represented the proceeds of drug trafficking, from two co-conspirators.

1300. On or about July 16, 2004, in Dallas, Texas, RICARDO MANCHA and LISA BAIRD discussed not being paid by a source of supply in Mexico for transporting a quantity of marijuana from Lexington, Kentucky, to St. Louis, Missouri.

1301. On or about July 17, 2004, in Dallas, Texas, RICARDO MANCHA telephoned a co-conspirator to inquire about obtaining a firearm to use while trying to collect a debt from a source of supply in Mexico.

1302. On or about July 17, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the debt owed by the source of supply in Mexico to RICARDO MANCHA and LISA BAIRD for transporting a quantity of marijuana from Lexington, Kentucky, to St. Louis, Missouri, and to other co-conspirators for importing illegal drugs into the United States.

1303. On or about July 20, 2004, in Dallas, Texas, RICARDO MANCHA left a voice-mail message on JOE RODRIGUEZ's cellular telephone complaining about the source of supply in Mexico not paying him for transporting a quantity of marijuana from Lexington, Kentucky, to St. Louis, Missouri.

1304. On or about July 20, 2004, in Dallas, Texas, RICARDO MANCHA and a source of supply in Mexico discussed the debt owed by the source of supply in Mexico to RICARDO MANCHA and LISA BAIRD for transporting a quantity of marijuana from Lexington, Kentucky, to St. Louis, Missouri, and to other co-conspirators for importing illegal drugs into the United States.

1305. On or about September 7, 2004, in Mesquite, Texas, RICHARD LESTER possessed with intent to distribute approximately 94 pounds of marijuana and identified himself to a law enforcement officer as Mark F. Shepard.

(All in violation of Title 21, United States Code, Section 846.)

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

From in or about September 1996, the exact date being unknown to the Grand Jury, and continuously thereafter up to and including the filing of this Indictment, in the Eastern District of Virginia and elsewhere, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez"; TERENCE LAMAR JOHNSON, a/k/a "Ronald Stroud," a/k/a "Kendoo" (hereinafter referred to as TERENCE JOHNSON); ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E" (hereinafter referred to ERIK MILLER); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); the defendants herein, unlawfully, intentionally, and knowingly, did engage in a continuing criminal enterprise, that is, they did knowingly and intentionally violate Title 21, United States Code, Sections 841, 843 (b) and 846, including, but not limited to, those violations alleged in this Indictment, which are re-alleged and incorporated by reference herein, and did commit other violations of said statutes, which violations were part of a continuing series of violations of said statutes undertaken by JOE RODRIGUEZ, TERENCE JOHNSON, ERIK MILLER, and CHARLES VICKERY in concert with at least five other persons with respect to whom they occupied positions of organizer, a supervisory position, and any other position of management, and from which continuing series of violations the defendants JOE RODRIGUEZ, TERENCE JOHNSON, ERIK MILLER, and CHARLES VICKERY obtained substantial income and resources.

(All in violation of Title 21, United States Code, Section 848 (a) and (c).)

### COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

From in or about September 1996, and continuously thereafter up to and including the filing of this Indictment, in the Eastern District of Virginia and elsewhere, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez;" (hereinafter referred to as JOE RODRIGUEZ); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy;" JESUS CEBALLOS, a/k/a "Chuy;" RICHARD BRYAN LESTER, a/k/a "Mark Shepard," a/k/a "Kentucky;" RICARDO OSCAR MANCHA, a/k/a "Rick;" and LAZARO ALVARDO RAMIREZ, JR., a/k/a "Agullero," a/k/a "Oscar," the defendants herein, did unlawfully, knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, both known and unknown, to commit the following offenses against the United States of America:

1. Import into the United States of America from a place outside thereof one thousand (1000) kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 960 (a) (1) and (b) (1) (G).

2. Import into the United States of America from a place outside thereof five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance, in violation of Title 21, United States Code, Sections 960 (a) (1) and (b) (1) (B) (ii).

### WAYS, MANNERS AND MEANS OF THE CONSPIRACY

The ways, manners and means of Count One of this Indictment are incorporated into this count by reference herein.

### OVERT ACTS

In furtherance of the conspiracy, and to bring about the objects and goals of the conspiracy, the defendants herein, committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the overt acts listed in Count One of this Indictment, which are incorporated by reference herein.

(All in violation of Title 21, United States Code, Section 963.)



#### COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From in or about September 1996, and continuously thereafter up to and including the filing of this Indictment, in the Eastern District of Virginia and elsewhere, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" (hereinafter referred to as JOE RODRIGUEZ); TERENCE LAMAR JOHNSON, a/k/a "Ronald Stroud," a/k/a "Kendoo" (hereinafter referred to as TERENCE JOHNSON); ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E" (hereinafter referred to ERIK MILLER); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); LISA LYNN BAIRD (hereinafter referred to as LISA BAIRD); ROGER BENT, a/k/a "Jason Knight," a/k/a "Bigs" (hereinafter referred to as ROGER BENT); ROBERT MACK DARR, a/k/a "Bobby" (hereinafter referred to as ROBERT DARR); ROBERT JAMES DUNN, JR., a/k/a "Rob" (hereinafter referred to as ROBERT DUNN, JR.); GLORIA LYNN GREEN (hereinafter referred to as GLORIA GREEN); PAMELA YVETTE HOFFLER-RIDDICK (hereinafter referred to as PAMELA HOFFLER-RIDDICK); LAMONIKA S. LAWRENCE (hereinafter referred to as LAMONIKA LAWRENCE); RICHARD BRYAN LESTER, a/k/a "Mark Shepard," a/k/a "Kentucky" (hereinafter referred to as RICHARD LESTER); RICARDO OSCAR MANCHA, a/k/a "Rick" (hereinafter referred to as RICARDO MANCHA); JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE); PABLO MAS OQUENDO; ELOISA RIOS QUINONES, a/k/a "Eloisa Vickery" (hereinafter referred to as ELOISA QUINONES); LAZARO ALVARDO RAMIREZ, JR., a/k/a "Agullero," a/k/a "Oscar" (hereinafter referred to as LAZARO RAMIREZ, JR.); JAMES FRANK SMALLWOOD, a/k/a "Pops" (hereinafter referred to as JAMES SMALLWOOD);

DOROTHY JOHNSON SMITH (hereinafter referred to as DOROTHY SMITH); FRED A MARIE SMITH (hereinafter referred to as FRED A SMITH); JACQUELINE STANTON STEWART, a/k/a "Jackie" (hereinafter referred to as (JACQUELINE STEWART); and CHARLES MCDONALD VICKERY II, a/k/a "Chico" (hereinafter referred to as CHARLES VICKERY, II), the defendants herein, did unlawfully, knowingly and intentionally combine conspire, confederate and agree with each other and other persons, both known and unknown, to knowingly conduct, attempt to conduct, and cause to be conducted financial transactions affecting interstate and foreign commerce, to wit: the sending and receiving of monies through the Western Union Financial Services, Inc. money transfer system (hereinafter referred to as a "wire transfer"), and causing movement of funds by wire transfer, from the Eastern District of Virginia (hereinafter referred to as EDVA) and elsewhere, to various locations, within and outside the United States, including Houston, Texas, and Miguel Aleman, Tampico, Mexico; the sending and receiving of United States currency (hereinafter referred to as "cash") shipped through United Postal Service from the EDVA and elsewhere to Houston, Texas; the depositing of cash to and the withdrawing of funds from Wachovia Bank, Premium Money Market account #XXXXXXXXXX1786 and CAP account #XXXXXXX6834 in the name of Aaron Burton; the depositing of cash to and the withdrawing of funds at Wachovia Bank in corporate accounts and at Virginia Educators Credit Union in the name of JOHN MCBRIDE; the purchase of money orders and cashiers checks with cash to pay for mortgage loans, apartment rental, credit cards, insurance, utilities, real estate and personal property taxes, jewelry, and to co-conspirators; the purchase, lease, financing, transfer and sale of personal and investment properties, including telephones and cellular telephones, rental vehicles, vehicles, securities, time shares, residences, rental properties, stash houses, travel expenses, and the shipment and transportation of controlled

substances and the remittance of monies derived from their illegal distribution to and from the EDVA and elsewhere, which involved the proceeds of a specified unlawful activity, that is the felonious receiving, concealing, buying, selling and otherwise distributing marijuana, cocaine, and cocaine base, in violation of Title 21, United States Code, Sections 841 (a) (1) and 846, by the defendants named in this Indictment, and that, while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, with the intent to promote the carrying on of specified unlawful activity and knowing that the financial transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership and control of the proceeds of the said specified unlawful activity and to avoid a transaction reporting requirement pursuant to Title 31, United States Code, Section 5313 (a) and Title 31, Code of Federal Regulations, Section 103.22.

#### WAYS, MANNERS AND MEANS OF THE CONSPIRACY

The ways, manners and means of Count One of this Indictment are incorporated into this count by reference herein.

#### OVERT ACTS

In furtherance of the conspiracy, and to bring about the objects and goals of the conspiracy, the defendants herein, committed overt acts in the EDVA and elsewhere, including, but not limited to, the overt acts listed in Count One of this Indictment, which are incorporated by reference herein.

(All in violation of Title 18, United States Code, Section 1956(h).)

COUNTS 5 - 182

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia and elsewhere, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" (hereinafter referred to as JOE RODRIGUEZ); ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E" (hereinafter referred to ERIK MILLER); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); ROBERT MACK DARR, a/k/a "Bobby" (hereinafter referred to as ROBERT DARR); ROBERT JAMES DUNN, JR., a/k/a "Rob" (hereinafter referred to as ROBERT DUNN, JR.); GLORIA LYNN GREEN (hereinafter referred to as GLORIA GREEN); PAMELA YVETTE HOFFLER-RIDDICK (hereinafter referred to as PAMELA HOFFLER-RIDDICK); LAMONIKA S. LAWRENCE (hereinafter referred to as LAMONIKA LAWRENCE); JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE); PABLO MAS OQUENDO; ELOISA RIOS QUINONES, a/k/a "Eloisa Vickery" (hereinafter referred to as ELOISA QUINONES); LAZARO ALVARDO RAMIREZ, JR., a/k/a "Agullero," a/k/a "Oscar" (hereinafter referred to as LAZARO RAMIREZ, JR.); JAMES FRANK SMALLWOOD, a/k/a "Pops" (hereinafter referred to as JAMES SMALLWOOD); FRED A. SMITH (hereinafter referred to as FRED A. SMITH); JACQUELINE STANTON STEWART, a/k/a "Jackie" (hereinafter referred to as JACQUELINE STEWART); and CHARLES MCDONALD VICKERY II, a/k/a "Chico" (hereinafter referred to as CHARLES VICKERY, II), the defendants herein, did knowingly conduct, attempt to conduct and cause to be conducted, a financial transaction affecting interstate and foreign commerce as described below, which involved the proceeds of a specified unlawful activity, that is the felonious receiving, concealing,

buying, selling and otherwise distributing marijuana, cocaine, and cocaine base, in violation of Title 21, United States Code, Sections 841 (a) (1) and 846, with the intent to promote the carrying on of the said specified unlawful activity; and knowing that the transaction was designed, in whole or in part, to conceal and disguise the nature, the location, the source, the ownership and the control of the proceeds of the said specified unlawful activity; and to avoid a transaction reporting requirement pursuant to Title 31, United States Code, Section 5313 (a) and Title 31, Code of Federal Regulations, Section 103.22, and that while conducting, attempting to conduct and causing such financial transaction to be conducted, knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity, being listed as follows:

<u>COUN</u> <u>T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
5	01/20/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the name Dave Johnson, sent a \$900 Western Union wire transfer from Hampton, Virginia, to FREDA SMITH in Houston, Texas.
6	01/22/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Hampton, Virginia, to FREDA SMITH in Houston, Texas.
7	02/28/00	FREDA SMITH	FREDA SMITH received a \$1,025 Western Union wire transfer in Houston, Texas, from a family member of a co-conspirator in Hampton, Virginia.
8	03/02/00	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, paid Public Storage at 11885 Jefferson Avenue in Newport News, Virginia, \$322.27 in United States currency for the lease of storage unit #E180.
9	04/06/00	JOE RODRIGUEZ ERIK MILLER	JOE RODRIGUEZ sent a \$300 Western Union wire transfer from Houston, Texas, to ERIK MILLER, under the alias name Dave Johnson in Hampton, Virginia.
10	04/14/00	FREDA SMITH ERIK MILLER	FREDA SMITH sent a \$500 Western Union wire transfer from Houston, Texas,

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			to ERIK MILLER, under the alias name Dave Johnson in Newport News, Virginia.
11	04/25/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
12	05/02/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
13	05/23/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$500 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
14	05/24/00	ERIK MILLER LAMONIKA LAWRENCE	ERIK MILLER, under the alias name Dave Johnson, sent a \$300 Western Union wire transfer from Newport News, Virginia, to LAMONIKA LAWRENCE in Indianapolis, Indiana.
15	06/02/00	JOE RODRIGUEZ ERIK MILLER	JOE RODRIGUEZ sent a \$500 Western Union wire transfer from Houston, Texas, to ERIK MILLER, under the alias name Dave Johnson in Newport News, Virginia.
16	06/06/00	JOE RODRIGUEZ ERIK MILLER	JOE RODRIGUEZ sent a \$300 Western Union wire transfer from Houston, Texas, to ERIK MILLER, under the alias name Dave Johnson in Newport News, Virginia.
17	06/11/00	JOE RODRIGUEZ ERIK MILLER	JOE RODRIGUEZ sent a \$700 Western Union wire transfer from Houston, Texas, to ERIK MILLER, under the alias name Dave Johnson in Newport News, Virginia.
18	06/18/00	JOE RODRIGUEZ ERIK MILLER	JOE RODRIGUEZ sent a \$500 Western Union wire transfer from Houston, Texas, to ERIK MILLER, under the alias name Dave Johnson in Newport News, Virginia.
19	06/20/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$300 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
20	06/20/00	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, paid Public Storage at 11885 Jefferson Avenue in Newport News, Virginia, \$198.33 in United States currency for the lease of storage unit

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			#G249.
21	07/11/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Hampton, Virginia, to FREDA SMITH in Houston, Texas.
22	07/11/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
23	07/23/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$700 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
24	08/02/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
25	08/08/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
26	08/16/00	JOHN MCBRIDE JAMES SMALLWOOD	JOHN MCBRIDE and JAMES SMALLWOOD deposited \$9,600 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE.
27	08/16/00	JOHN MCBRIDE JAMES SMALLWOOD	JOHN MCBRIDE and JAMES SMALLWOOD withdrew \$10,000 at the Virginia Educators Credit Union in Newport News, Virginia from account #XX457-9 in the name of JOHN MCBRIDE by check #091404 made payable to First Union Securities.
28	08/17/00	JOHN MCBRIDE JAMES SMALLWOOD	JOHN MCBRIDE and JAMES SMALLWOOD deposited \$10,000 by check #091404 at First Union Securities in Richmond, Virginia, into account #XXXX-8854 in the name of JAMES SMALLWOOD.
29	08/22/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Hampton, Virginia, to FREDA SMITH in Houston, Texas.

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
30	08/29/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
31	08/29/00	JOHN MCBRIDE	JOHN MCBRIDE deposited \$9,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.
32	08/30/00	JOHN MCBRIDE	JOHN MCBRIDE deposited \$9,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.
33	08/31/00	JOHN MCBRIDE	JOHN MCBRIDE deposited \$8,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia into account #XX457-9 in the name of JOHN MCBRIDE to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.
34	08/31/00	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$25,951.65 at the Virginia Educators Credit Union in Newport News, Virginia from account #XX457-9 in the name of JOHN MCBRIDE by check #091468 payable to Williamsburg Title and Escrow to be utilized as part of the down payment for the purchase of 222 Syms Street, Hampton, Virginia, by Aaron Burton.
35	08/31/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
36	09/05/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to



<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			FREDA SMITH in Houston, Texas.
37	09/09/00	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, paid Public Storage at 11885 Jefferson Avenue in Newport News, Virginia, \$170 in United States currency for the lease of storage unit #G249.
38	09/10/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
39	09/11/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
40	09/27/00	JOHN MCBRIDE PAMELA HOFFLER- RIDDICK	JOHN MCBRIDE and PAMELA HOFFLER-RIDDICK deposited and caused to be deposited \$9,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-0 in the name of JOHN MCBRIDE for the pay-off of loan #XXXXXXXXXX0644 at Chrysler Financial Corporation in the name of PAMELA HOFFLER-RIDDICK for Aaron Burton's 1998 Chrysler Town and Country van.
41	09/27/00	JOHN MCBRIDE PAMELA HOFFLER- RIDDICK	JOHN MCBRIDE and PAMELA HOFFLER-RIDDICK withdrew and caused to be withdrawn \$9,000 at the Virginia Educators Credit Union in Newport News, Virginia, from account #XX457-0 in the name of JOHN MCBRIDE by check #091613 payable to Chrysler Financial Corporation for the pay-off of loan #XXXXXXXXXX2064 in the name of PAMELA HOFFLER-RIDDICK for Aaron Burton's 1998 Chrysler Town and Country van.
42	09/28/00	JOHN MCBRIDE PAMELA HOFFLER- RIDDICK	JOHN MCBRIDE and PAMELA HOFFLER-RIDDICK deposited and caused to be deposited \$7,650 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-0 in the name of

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			JOHN MCBRIDE for the pay-off of loan #XXXXXXXXXX0644 at Chrysler Financial Corporation in the name of PAMELA HOFFLER-RIDDICK for Aaron Burton's 1998 Chrysler Town and Country van.
43	09/28/00	JOHN MCBRIDE PAMELA HOFFLER- RIDDICK	JOHN MCBRIDE and PAMELA HOFFLER-RIDDICK withdrew and caused to be withdrawn \$7,629.74 at the Virginia Educators Credit Union in Newport News, Virginia from account #XX457-0 in the name of JOHN MCBRIDE by check #091104 payable to Chrysler Financial Corporation for the pay-off of loan #XXXXXXXXXX0644 in the name of PAMELA HOFFLER-RIDDICK for Aaron Burton's 1998 Chrysler Town and Country van.
44	09/28/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$950 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
45	10/06/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent an \$800 Western Union wire transfer from Newport News, Virginia, to ELOISA QUINONES in Houston, Texas.
46	10/13/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
47	10/16/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
48	10/20/00	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$700 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
49	11/01/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$300 Western Union wire transfer from Newport News, Virginia, to ELOISA QUINONES in Houston, Texas.
50	11/03/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$500 Western Union wire transfer from Newport

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			News, Virginia, to ELOISA QUINONES in Houston, Texas.
51	11/08/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$500 Western Union wire transfer from Newport News, Virginia, to ELOISA QUINONES in Houston, Texas.
52	11/08/00	JOHN MCBRIDE	JOHN MCBRIDE purchased cashier's check #009456 in the amount of \$3,000 payable to TPG, LLC at Harbor Bank in the Eastern District of Virginia, to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
53	11/08/00	JOHN MCBRIDE	JOHN MCBRIDE purchased official check #237580628 in the amount of \$2,500 payable to TPG, LLC at Centura Bank in the Eastern District of Virginia, to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
54	11/09/00	JOHN MCBRIDE	JOHN MCBRIDE purchased cashier's check #072756 in the amount of \$2,500 payable to TPG, LLC at Peninsula Trust Bank, in the Eastern District of Virginia, to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
55	11/11/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent an \$800 Western Union wire transfer from Newport News, Virginia, to ELOISA QUINONES in Houston, Texas.
56	11/13/00	JOHN MCBRIDE	JOHN MCBRIDE purchased official check #138676325 in the amount of \$2,500 payable to TPG, LLC at Centura Bank in the Eastern District of Virginia, to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
57	11/16/00	CHARLES VICKERY	CHARLES VICKERY paid Powell and Associates Realty Inc., in Newport News, Virginia, \$1,600 in United States currency for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

<u>COUN</u> <u>T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
58	11/17/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Newport News, Virginia, to ELOISA QUINONES in Houston, Texas.
59	11/17/00	JOHN MCBRIDE	JOHN MCBRIDE purchased official check #204628232 in the amount of \$8,500 payable to TPG, LLC at First Union National Bank in the Eastern District of Virginia, to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
60	11/20/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
61	11/20/00	JOHN MCBRIDE	JOHN MCBRIDE deposited \$30,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE to be utilized as part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.
62	11/21/00	JOHN MCBRIDE	JOHN MCBRIDE and PAMELA HOFFLER-RIDDICK deposited and caused to be deposited \$39,000 at First Union National Bank, in Norfolk, Virginia, into account #XXXXXXXXXX5814 in the name of TPG, LLC consisting of cashier's checks, official checks and Western Union money orders to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
63	11/21/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$500 Western Union wire transfer from Newport News, Virginia, to ELOISA QUINONES in Houston, Texas.
64	11/22/00	JOHN MCBRIDE	JOHN MCBRIDE deposited \$8,500 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE to be utilized as

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.
65	11/22/00	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$38,459.65 at the Virginia Educators Credit Union in Newport News, Virginia, from account #17457-9 in the name of JOHN MCBRIDE by check #097726 payable to Williamsburg Title and Escrow to be utilized as part of the down payment for the purchase of 502 Marshall Street, Hampton, Virginia, by Aaron Burton.
66	11/25/00	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, received a \$900 Western Union wire transfer in Houston, Texas, from a co-conspirator in Hampton, Virginia.
67	11/25/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$600 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
68	11/27/00	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$30,570.10 at First Union National Bank in the Eastern District of Virginia, from account #XXXXXXXXXX5814 in the name of TPG, LLC by check payable to First Union National Bank to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
69	11/27/00	JOHN MCBRIDE	JOHN MCBRIDE purchased official check #142564549 in the amount of \$30,570.10 payable to Williamsburg Title and Escrow at First Union National Bank in the Eastern District of Virginia, to be utilized as part of the down payment for the purchase of 323 E. Pembroke Avenue, Hampton, Virginia, by Aaron Burton.
70	11/30/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
71	12/03/00	CHARLES VICKERY CHARLES VICKERY, II	CHARLES VICKERY sent a \$500 Western Union wire transfer from Hampton, Virginia, to CHARLES

<u>COUNT</u> <u>T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			VICKERY, II, in Houston, Texas.
72	12/05/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
73	12/07/00	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$950 Western Union wire transfer from Newport News, Virginia, to ELOISA QUINONES in Houston, Texas.
74	12/14/00	CHARLES VICKERY	CHARLES VICKERY paid \$400 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
75	12/23/00	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson sent a \$500 Western Union wire transfer from Houston, Texas, to a co-conspirator in Hampton, Virginia.
76	01/01/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
77	01/13/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$500 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
78	01/17/01	JOE RODRIGUEZ LAZARO RAMIREZ, JR	JOE RODRIGUEZ sent a \$500 Western Union wire transfer from Hampton, Virginia, to a family member of LAZARO RAMIREZ, JR., in Houston, Texas.
79	01/28/01	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, paid Public Storage at 11885 Jefferson Avenue in Newport News, Virginia, \$85 in United States currency for the lease of storage unit #G249.
80	01/31/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
81	02/09/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$300 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
82	02/12/01	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, paid Public Storage at 11885 Jefferson Avenue in Newport News, Virginia, \$85 in United States currency for the lease of storage unit #G249.
83	02/14/01	ERIK MILLER ROBERT DUNN, JR.	ERIK MILLER, under the alias name Dave Johnson, sent a \$1,000 Western Union wire transfer from Houston, Texas, to ROBERT DUNN, JR., in Richmond, Virginia.
84	02/14/01	JOE RODRIGUEZ	JOE RODRIGUEZ purchased a 1995 Chevrolet Corvette for \$21,232.75 at Pomoco Nissan of Hampton in Hampton, Virginia, by signing a promissory note for \$16,232.75 and paying \$5,000 in United States currency.
85	02/14/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ deposited \$16,233 in United States currency at First Union National Bank in Newport News, Virginia, into account #XXXXXXXXXX5814 in the name of TPG, LLC for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.
86	02/16/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$500 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
87	02/16/01	CHARLES VICKERY CHARLES VICKERY, II	CHARLES VICKERY sent a \$500 Western Union wire transfer from Hampton, Virginia, to CHARLES VICKERY, II, in Houston, Texas.
88	02/21/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ withdrew \$16,262.77 at First Union National Bank in Newport News, Virginia, from account #XXXXXXXXXX5814 in the name of TPG, LLC by check #1005 payable to the Virginia Educators Credit Union for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.
89	02/21/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ paid \$16,262.77 at the Virginia Educators

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			Credit Union in Newport News, Virginia, against loan #XX457-1 in the name of JOHN MCBRIDE for the purchase of a 1995 Chevrolet Corvette by JOE RODRIGUEZ.
90	02/22/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES in Houston, Texas.
91	03/01/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$925 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in Houston, Texas.
92	03/01/01	CHARLES VICKERY CHARLES VICKERY, II	CHARLES VICKERY sent a \$925 Western Union wire transfer from Newport News, Virginia, to CHARLES VICKERY, II, in Houston, Texas.
93	03/02/01	ERIK MILLER	ERIK MILLER sent a \$900 Western Union wire transfer from Houston, Texas, to a co-conspirator in Hampton, Virginia
94	03/02/01	ERIK MILLER ROBERT DUNN, JR.	ERIK MILLER sent a \$200 Western Union wire transfer from Houston, Texas, to ROBERT DUNN, JR., in Richmond, Virginia.
95	03/15/01	ERIK MILLER FREDA SMITH	ERIK MILLER sent a \$900 Western Union wire transfer from Newport News, Virginia, to FREDA SMITH in Houston, Texas.
96	03/25/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$500 Western Union wire transfer from Hampton, Virginia, to ELOISA QUINONES Houston, Texas.
97	03/26/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
98	03/28/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.



<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
99	03/30/01	JOE RODRIGUEZ	JOE RODRIGUEZ purchased a 1998 Ford Expedition for \$24,741.55 at Pomoco Nissan of Hampton in Hampton, Virginia, by signing a promissory note for \$24,741.55 and paying \$9,000 in United States currency.
100	04/04/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ deposited \$5,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE for the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ.
101	04/06/01	JOHN MCBRIDE JAMES SMALLWOOD	JOHN MCBRIDE and JAMES SMALLWOOD deposited \$20,000 in United States currency at First Union National Bank in Newport News, Virginia, into account #XXXXXXXXXX5814 in the name of TPG, LLC for JAMES SMALLWOOD.
102	04/09/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ deposited \$5,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE for the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ.
103	04/09/01	ROBERT DUNN, JR. ERIK MILLER	ROBERT DUNN, JR., sent a \$1000 Western Union wire transfer from Richmond, Virginia, to ERIK MILLER, under the alias name Dave Johnson, in Houston, Texas.
104	04/10/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ deposited \$5,710 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE for the purchase of a 1998 Ford Expedition by JOE RODRIGUEZ.
105	04/10/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ transferred \$15,773.25 from account #XX457-9 to pay-off loan #XXX57-25 at the Virginia Educators Credit Union in Newport News, Virginia, for the purchase

<u>COUN</u> <u>I</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			of a 1998 Ford Expedition by JOE RODRIGUEZ.
106	04/17/01	FREDA SMITH ERIK MILLER	FREDA SMITH sent a \$600 Western Union wire transfer from Houston, Texas, to ERIK MILLER, under the alias name Dave Johnson, in Newport News, Virginia.
107	04/17/01	JOHN MCBRIDE JAMES SMALLWOOD	JOHN MCBRIDE and JAMES SMALLWOOD withdrew \$25,000 at First Union National Bank in the Eastern District of Virginia, by check #1008 from account #XXXXXXXXXX5814 in the name of TPG, LLC for JAMES SMALLWOOD.
108	05/08/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, to lease storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
109	05/09/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in Houston, Texas.
110	05/14/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$500 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in Houston, Texas.
111	05/17/01	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, received a \$900 Western Union wire transfer in Houston, Texas, at approximately 11:42 a.m., from a co-conspirator, under the alias name Jayson Taylor, in Hampton, Virginia.
112	05/17/01	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, received a \$900 Western Union wire transfer in Houston, Texas, at approximately 11:44 a.m., from a co-conspirator, under the alias name Jayson Taylor, in Hampton, Virginia.
113	05/17/01	ROBERT DUNN, JR. FREDA SMITH	ROBERT DUNN, JR., sent a \$925 Western Union wire transfer from Richmond, Virginia, to FREDA SMITH in Houston, Texas.
114	05/18/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			Houston, Texas.
115	05/23/01	ELOISA QUINONES CHARLES VICKERY, II	ELOISA QUINONES sent a \$100 Western Union wire transfer from Norfolk, Virginia, to CHARLES VICKERY, II, in Houston, Texas.
116	05/30/01	FREDA SMITH	FREDA SMITH sent a \$50 Western Union wire transfer from Houston, Texas, to a family member of a co-conspirator in Richmond, Virginia.
117	06/01/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
118	07/09/01	ERIK MILLER	ERIK MILLER, under the alias name Dave Johnson, received a \$2,800 Western Union wire transfer in Houston, Texas, from a family member of a co-conspirator in Hampton, Virginia.
119	07/17/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
120	07/18/01	ROBERT DUNN, JR. FREDA SMITH	ROBERT DUNN, JR., sent a \$200 Western Union wire transfer from Richmond, Virginia, to FREDA SMITH in Houston, Texas.
121	07/23/01	JOE RODRIGUEZ  PABLO MAS OQUENDO	JOE RODRIGUEZ purchased a 2001 Lincoln Town Car (VIN: 1LNHM82WX1Y632736) for \$42,511 from PABLO MAS OQUENDO at Pomoco Lincoln-Mercury of Newport News, Inc., in Newport News, Virginia, by paying \$15,000 in United States currency.
122	07/23/01	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$2,900 Western Union wire transfer from Farm Fresh #231 in Newport News, Virginia, to FREDA SMITH in Houston, Texas.
123	07/23/01	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$2,900 Western Union wire

<u>COUNT</u> <u>T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			transfer from Farm Fresh #330 in Newport News, Virginia, to FREDA SMITH in Houston, Texas.
124	07/23/01	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$2,900 Western Union wire transfer from Rite Aid Pharmacy #3906 in Newport News, Virginia, to FREDA SMITH that was received in Houston, Texas.
125	07/23/01	ERIK MILLER FREDA SMITH	ERIK MILLER, under the alias name Dave Johnson, sent a \$1,200 Western Union wire transfer from Kroger #534 in York County, Virginia, to FREDA SMITH in Houston, Texas.
126	07/23/01	CHARLES VICKERY CHARLES VICKERY, II	CHARLES VICKERY sent a \$900 Western Union wire transfer from Norfolk, Virginia, to CHARLES VICKERY, II, in Houston, Texas.
127	07/25/01	JOE RODRIGUEZ PABLO MAS OQUENDO	JOE RODRIGUEZ paid \$4,511.06 in United States currency towards the purchase of a 2001 Lincoln Town Car (VIN: 1LNHM82WX1Y632736) from PABLO MAS OQUENDO at Pomoco Lincoln-Mercury of Newport News, Inc., in Newport News, Virginia.
128	07/25/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$400 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in Houston, Texas.
129	08/03/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
130	08/15/01	CHARLES VICKERY CHARLES VICKERY, II	CHARLES VICKERY sent a \$500 Western Union wire transfer from Norfolk, Virginia, to CHARLES VICKERY, II, in Houston, Texas.
131	08/24/01	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$200 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in Houston, Texas.
132	09/06/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
133	11/07/01	CHARLES VICKERY	CHARLES VICKERY paid \$1,600 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
134	12/06/01	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
135	01/17/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
136	02/07/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
137	02/07/02	CHARLES VICKERY PABLO MAS OQUENDO JOE RODRIGUEZ	CHARLES VICKERY purchased a 2000 GMC pickup truck for \$21,907.77 from PABLO MAS OQUENDO at Pomoco Chrysler Plymouth of Newport News in Newport News, Virginia, by paying \$4,000 in United States currency via receipt dated February 7, 2002 and \$6,707.77 by check #0263 dated February 25, 2002, drawn on account #XXXX6712 in the name of CHARLES VICKERY at SouthTrust Bank; and receiving a \$11,200 trade-in allowance on a 1991 Toyota 4Runner owned by JOE RODRIGUEZ and a 1993 Ford F350 pickup truck owned by CHARLES VICKERY.

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
138	02/14/02	JOE RODRIGUEZ CHARLES VICKERY	JOE RODRIGUEZ and CHARLES VICKERY purchased a 1999 Nissan pickup truck for \$11,737.65 at Checkered Flag Toyota in Virginia Beach, Virginia, by paying \$9000 in United States currency and SouthTrust Bank official check #12689009 for \$2,737.65 purchased by CHARLES VICKERY in United States currency.
139	02/27/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
140	03/01/02	CHARLES VICKERY	CHARLES VICKERY deposited \$6,800 in United States currency at SouthTrust Bank in Hampton, Virginia, into account #XXXX6712 in the name of CHARLES VICKERY for the purchase of a 2000 GMC pickup truck.
141	03/22/02	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$400 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in Houston, Texas.
142	04/16/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
143	05/07/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
144	06/03/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
145	07/01/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
146	07/01/02	CHARLES VICKERY, II CHARLES VICKERY	CHARLES VICKERY, II, sent a \$950 Western Union wire transfer from New Caney, Texas, to CHARLES VICKERY in Hampton, Virginia.
147	07/17/02	CHARLES VICKERY ELOISA QUINONES	CHARLES VICKERY sent a \$900 Western Union wire transfer from Norfolk, Virginia, to ELOISA QUINONES in Houston, Texas.
148	07/18/02	CHARLES VICKERY PABLO MAS OQUENDO	CHARLES VICKERY purchased a 2002 Dodge R3500 pickup truck (VIN: 3B7MF33662M257083) from PABLO MAS OQUENDO at Pomoco of Smithfield, Inc., in Smithfield, Virginia, for \$38,453.98 by receiving a \$17,000 trade-in allowance on a 2000 GMC pickup truck; by financing \$18,953.98 with DaimlerChrysler; and by receiving a \$2,500 manufacturer's rebate.
149	07/22/02	CHARLES VICKERY, II CHARLES VICKERY	CHARLES VICKERY, II, sent a \$900 Western Union wire transfer from New Caney, Texas, to CHARLES VICKERY in Norfolk, Virginia.
150	07/30/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
151	08/23/02	CHARLES VICKERY, II CHARLES VICKERY	CHARLES VICKERY, II, sent a \$900 Western Union wire transfer from New Caney, Texas, to CHARLES VICKERY in Norfolk, Virginia.
152	09/03/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
153	10/01/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
154	11/04/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
155	11/14/02	JOHN MCBRIDE	JOHN MCBRIDE deposited \$5,000 in United States currency at First Union National Bank in Chesapeake, Virginia, into account #XXXXXXX9453 in the name of JOHN MCBRIDE to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
156	11/18/02	JOHN MCBRIDE	JOHN MCBRIDE deposited check #2137 for \$6,700 at First Union National Bank in Chesapeake, Virginia, into account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
157	11/18/02	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$6,700 at First Union National Bank in the Eastern District of Virginia, from account #XXXXXXX9453 in the name of JOHN MCBRIDE by check #2137 payable to JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
158	11/18/02	JOHN MCBRIDE	JOHN MCBRIDE deposited \$5,000 in United States currency at First Union National Bank in Chesapeake, Virginia, into account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
159	11/20/02	JOHN MCBRIDE	JOHN MCBRIDE deposited \$5,000 in United States currency at First Union



<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			National Bank in the Eastern District of Virginia, into account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
160	11/20/02	JOHN MCBRIDE	JOHN MCBRIDE deposited \$5,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
161	11/22/02	JOHN MCBRIDE	JOHN MCBRIDE deposited \$4,145 in United States currency at First Union National Bank in Chesapeake, Virginia, into account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc., to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
162	11/29/02	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$19,150 at First Union National Bank in the Eastern District of Virginia, from account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc., by check #1008 payable to Aaron Burton and falsely claimed it was for a "consulting contract" when he knew it was to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
163	12/02/02	JOE RODRIGUEZ PABLO MAS OQUENDO	JOE RODRIGUEZ purchased a 2000 Lincoln LS for \$20,808 from PABLO MAS OQUENDO at Pomoco Chrysler of Newport News in Newport News, Virginia, by paying \$8,808 in United States currency via a receipt dated November 30, 2002, and receiving a \$12,000 trade-in allowance on a 1998 Ford Expedition.
164	12/02/02	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$5,000 at the Virginia Educators Credit Union in Newport News, Virginia, from account #XX457-9 in the name of JOHN MCBRIDE by check #550 payable to

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			Aaron Burton to be utilized for the purchase of 5525 Germain Road, Richmond, Virginia, by Aaron Burton.
165	12/02/02	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
166	12/17/02	CHARLES VICKERY, II CHARLES VICKERY	CHARLES VICKERY, II, sent a \$900 Western Union wire transfer from New Caney, Texas, to CHARLES VICKERY in Norfolk, Virginia.
167	04/29/03	CHARLES VICKERY	CHARLES VICKERY paid \$1,600 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
168	05/01/03	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
169	07/16/03	CHARLES VICKERY	CHARLES VICKERY paid \$1,700 by check to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
170	09/05/03	CHARLES VICKERY	CHARLES VICKERY paid \$800 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
171	10/07/03	CHARLES VICKERY	CHARLES VICKERY paid \$1,600 in United States currency to Powell and Associates Realty, Inc., in Newport News, Virginia, for the lease of storage unit #34 located at 2805 Build America Drive, Hampton, Virginia.
172	10/30/03	LAZARO RAMIREZ, JR	LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer from Norfolk,

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			Virginia, to a co-conspirator in Houston, Texas.
173	11/01/03	CHARLES VICKERY  PABLO MAS OQUENDO	CHARLES VICKERY purchased a 1998 Ford Taurus for \$3,971.17 from PABLO MAS OQUENDO at Pomoco Chrysler Plymouth of Newport News in Newport News, Virginia.
174	11/24/03	LAZARO RAMIREZ, JR	LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer from Norfolk, Virginia, to a co-conspirator in Roma, Texas.
175	11/24/03	LAZARO RAMIREZ, JR	LAZARO RAMIREZ, JR., sent a \$300 Western Union wire transfer from Norfolk, Virginia, to a co-conspirator in Roma, Texas.
176	11/24/03	LAZARO RAMIREZ, JR	LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer from Norfolk, Virginia, to a co-conspirator in Houston, Texas.
177	11/24/03	LAZARO RAMIREZ, JR	LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer from Newport News, Virginia, to a co-conspirator in Roma, Texas.
178	11/24/03	LAZARO RAMIREZ, JR	LAZARO RAMIREZ, JR., sent a \$900 Western Union wire transfer from Hampton, Virginia, to a co-conspirator in Roma, Texas.
179	12/09/03	CHARLES VICKERY	CHARLES VICKERY directed two co-conspirators through Lionel Joyner to purchase 12 United States Postal money orders from the U. S. Postal Service in Norfolk, Virginia, totaling \$7,600 with the payee name left blank.
180	03/09/04	JACQUELINE STEWART	Aaron Burton deposited \$1,000 in United States currency into Connects Federal Credit Union account #XXX1271 in the name of JACQUELINE STEWART at the Credit Union Service Center, in Henrico County, Virginia.
181	03/23/04	ROBERT DARR JOE RODRIGUEZ	JOE RODRIGUEZ paid approximately \$22,000 in United States currency to ROBERT DARR through Aaron Burton at Pomoco Auto Group in Newport News, Virginia, on behalf of JOE RODRIGUEZ

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>FINANCIAL TRANSACTION</u>
			for a payment and insurance on a 2002 Chevrolet Corvette (VIN: 1G1YY32G525124514).
182	05/11/04	JACQUELINE STEWART	Aaron Burton deposited \$1,000 in United States currency into Connects Federal Credit Union account #XXX1271 in the name of JACQUELINE STEWART at the Credit Union Service Center, in Henrico County, Virginia.

(All in violation of Title 18, United States Code, Sections 1956 (a) (1) (A) (i), (a) (1) (B) (i), (a) (1) (B) (ii) and 2.)

COUNTS 183 - 195

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" (hereinafter referred to as JOE RODRIGUEZ); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); ROBERT MACK DARR, a/k/a "Bobby" (hereinafter referred to as ROBERT DARR); JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE); PABLO MAS OQUENDO; and JAMES FRANK SMALLWOOD, a/k/a "Pops" (hereinafter referred to as JAMES SMALLWOOD), the defendants herein, did knowingly engage and attempt to engage in a monetary transaction by, through and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, the deposit, withdrawal, transfer, and exchange of United States currency, funds and monetary instruments in the amounts described below, such property having been derived from a specified unlawful activity, that is, the felonious receiving, concealing, buying, selling and otherwise distributing marijuana, cocaine and cocaine base, in violation of Title 21, United States Code, Section 841 (a) (1).

<u>COUN T</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>MONETARY TRANSACTION</u>
183	08/31/00	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$25,951.65 at the Virginia Educators Credit Union in Newport News, Virginia, by check #091468 from account #XX457-9 in the name of JOHN MCBRIDE.
184	11/20/00	JOHN MCBRIDE	JOHN MCBRIDE deposited \$30,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9 in the name of JOHN MCBRIDE.
185	11/21/00	JOHN MCBRIDE	JOHN MCBRIDE deposited \$39,000 at First Union National Bank in Norfolk,

			Virginia, consisting of cashier's checks, official checks and Western Union money orders into account #XXXXXXXXXX5814 in the name of TPG, LLC.
186	11/22/00	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$38,459.65 at the Virginia Educators Credit Union in Newport News, Virginia, by check #097726 from account #XX457-9 in the name of JOHN MCBRIDE.
187	11/27/00	JOHN MCBRIDE	JOHN MCBRIDE transferred and exchanged a counter check in the amount of \$30,570.10 for official check #142564549 at First Union National Bank in the Eastern District of Virginia.
188	02/14/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ deposited \$16,233 in United States currency at First Union National Bank in Newport News, Virginia, into account #XXXXXXXXXX5814 in the name TPG, LLC.
189	02/21/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ withdrew \$16,262.77 at First Union National Bank in Newport News, Virginia, by check #1005 from account #XXXXXXXXXX5814 in the name TPG, LLC.
190	02/21/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ transferred and exchanged check #1005 against loan #XX457-1 in the amount of \$16,262.77 in the name of JOHN MCBRIDE at the Virginia Educators Credit Union in Newport News, Virginia.
191	04/06/01	JOHN MCBRIDE JAMES SMALLWOOD	JOHN MCBRIDE and JAMES SMALLWOOD deposited \$20,000 in United States currency at First Union National Bank in Newport News, Virginia, into account #XXXXXXXXXX5814 in the name TPG, LLC.
192	04/10/01	JOHN MCBRIDE JOE RODRIGUEZ	JOHN MCBRIDE and JOE RODRIGUEZ transferred and exchanged \$15,773.25 at the Virginia Educators Credit Union in Newport News, Virginia, from account #XX459-9 to account #XXX57-25, both in the name of JOHN MCBRIDE.
193	04/17/01	JOHN MCBRIDE JAMES SMALLWOOD	JOHN MCBRIDE and JAMES SMALLWOOD withdrew \$25,000 at First

			Union National Bank in the Eastern District of Virginia, by check #1008 from account #XXXXXXXXXX5814 in the name of TPG, LLC.
194	07/23/01	JOE RODRIGUEZ PABLO MAS OQUENDO	JOE RODRIGUEZ and PABLO MAS OQUENDO transferred and exchanged more than \$10,000 in United States currency at Pomoco Lincoln-Mercury of Newport News, Inc., in Newport News, Virginia.
195	11/29/02	JOHN MCBRIDE	JOHN MCBRIDE withdrew \$19,150 at First Union National Bank in the Eastern District of Virginia, by check #1008 from account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc.

(All in violation of Title 18, United States Code, Sections 1957 and 2.)

COUNT 196

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 20, 2000, in the Eastern District of Virginia, the defendant, GLORIA GREEN, the branch manager of the Beechmont Branch of the Virginia Educators Credit Union in Newport News, Virginia, did knowingly and intentionally and for the purposes of evading the reporting requirements of Title 31, United States Code, Section 5313(a), and the regulations promulgated thereunder, cause and attempt to cause a domestic financial institution, to wit: the Virginia Educators Credit Union, to fail to file a currency transaction report required under Section 5313(a).

(In violation of Title 31, United States code, Sections 5324 (a)(1), 5324 (d) and 5322 (b); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code Section 2.)



COUNT 197

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia, JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE), the defendant herein, did knowingly and intentionally and for the purpose of evading the reporting requirements of Title 31, United States Code, section 5313(a) and the regulations promulgated thereunder, structure, assist in structuring and attempt to structure and assist in structuring the following transactions with a domestic financial institution, to wit: the Beechmont Branch of the Virginia Educators Credit Union in Newport News, Virginia, and did so while violating another law of the United States:

<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
08/29/00	JOHN MCBRIDE deposited \$9,000 in United States currency at the Virginia Educators Credit Union into account #XX457-9.
08/30/00	JOHN MCBRIDE deposited \$9,000 in United States currency at the Virginia Educators Credit Union into account #XX457-9.
08/31/00	JOHN MCBRIDE deposited \$8,000 in United States currency at the Virginia Educators Credit Union into account #XX457-9.

(In violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.)

COUNT 198

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia, JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE), the defendant herein, did knowingly and intentionally and for the purpose of evading the reporting requirements of Title 31, United States Code, section 5313(a) and the regulations promulgated thereunder, structure, assist in structuring and attempt to structure and assist in structuring the following transactions with a domestic financial institution, to wit: the Beechmont Branch of the Virginia Educators Credit Union in Newport News, Virginia, and did so while violating another law of the United States:

<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
09/27/00	JOHN MCBRIDE deposited \$9,000 in United States currency at the Virginia Educators Credit Union into account #XX457-0.
09/28/00	JOHN MCBRIDE deposited \$7,650 in United States currency at the Virginia Educators Credit Union into account #XX457-0.

(In violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.)

COUNT 199

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia, JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE), the defendant herein, did knowingly and intentionally and for the purpose of evading the reporting requirements of Title 31, United States Code, section 5313(a) and the regulations promulgated thereunder, structure, assist in structuring and attempt to structure and assist in structuring the following transactions with a domestic financial institution, to wit: the Beechmont Branch of the Virginia Educators Credit Union in Newport News, Virginia, and did so while violating another law of the United States:

<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
04/04/01	JOHN MCBRIDE deposited \$5,000 in United States currency at the Virginia Educators Credit Union into account #XX457-9.
04/09/01	JOHN MCBRIDE deposited \$5,000 in United States currency at the Virginia Educators Credit Union into account #XX457-9.
04/10/01	JOHN MCBRIDE deposited \$5,710 in United States currency at the Virginia Educators Credit Union into account #XX457-9.

(In violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.)

COUNT 200

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia, ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie" (hereinafter referred to ERIK MILLER) and FRED A MARIE SMITH (hereinafter referred to as FRED A SMITH), the defendants herein, did knowingly and intentionally and for the purpose of evading the reporting requirements of Title 31, United States Code, section 5313(a) and the regulations promulgated thereunder, structure, assist in structuring and attempt to structure and assist in structuring the following transactions with a domestic financial institution, to wit: various agents of Western Union Financial Services, Inc., and did so while violating another law of the United States:

<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
07/23/01	ERIK MILLER paid Western Union Financial Services, Inc., through their agent Farm Fresh #231 in Newport News, Virginia, \$3,035 United States currency to send a \$2,900 wire transfer to FRED A SMITH.
07/23/01	ERIK MILLER paid Western Union Financial Services, Inc., through their agent Farm Fresh #330 in Newport News, Virginia, \$3,035 United States currency to send a \$2,900 wire transfer to FRED A SMITH.
07/23/01	ERIK MILLER paid Western Union Financial Services, Inc., through their agent Rite Aid Pharmacy #3906 in Newport News, Virginia, \$3,035 United States currency to send a \$2,900 wire transfer to FRED A SMITH.
07/23/01	ERIK MILLER paid Western Union Financial Services, Inc., through their agent Kroger #534 in York County, Virginia, \$1,285 United States currency to send a \$1,200 wire transfer to FRED A SMITH.

(In violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.)

COUNT 201

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the Eastern District of Virginia, JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE), the defendant herein, did knowingly and intentionally and for the purpose of evading the reporting requirements of Title 31, United States Code, section 5313(a) and the regulations promulgated there under, structure, assist in structuring and attempt to structure and assist in structuring the following transactions with one or more domestic financial institutions, to wit: various branches of First Union National Bank and the Virginia Educators Credit Union and did so while violating another law of the United States:

<u>DATE</u>	<u>FINANCIAL TRANSACTION</u>
11/14/02	JOHN MCBRIDE deposited \$5,000 in United States currency at First Union National Bank in Chesapeake, Virginia, into account #XXXXXXX9453.
11/18/02	JOHN MCBRIDE deposited \$5,000 in United States currency at First Union National Bank in Chesapeake, Virginia, into account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc.
11/20/02	JOHN MCBRIDE deposited \$5,000 in United States currency at First Union National Bank in the Hampton Roads area of Virginia, into account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc.
11/20/02	JOHN MCBRIDE deposited \$5,000 in United States currency at the Virginia Educators Credit Union in Newport News, Virginia, into account #XX457-9.
11/22/02	JOHN MCBRIDE deposited \$4,145 in United States currency at First Union National Bank in Chesapeake, Virginia, into account #XXXXXXXXXX0931 in the name of JCM Information Services, Inc.

(In violation of Title 31, United States Code, Sections 5324(a)(3) and 5324(d); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.)

COUNT 202

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 14, 2003, at the Microtel Inn, in Henrico County, Virginia, in the Eastern District of Virginia, CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendant herein, did unlawfully, knowingly and intentionally distribute approximately four (4) kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (B) (ii) and Title 18, United States Code, Section 2.)

COUNT 203

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2004, at the Best Western Governors Inn, in Richmond, Virginia, in the Eastern District of Virginia, RICHARD BRYAN LESTER, a/k/a "Mark Shepard," a/k/a "Kentucky" and CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendants herein, did unlawfully, knowingly and intentionally distribute approximately ten (10) kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (A) (ii) and Title 18, United States Code, Section 2.)

COUNT 204

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, in the Eastern District of Virginia, JACQUELINE STANTON STEWART, a/k/a "Jackie," the defendant herein, did unlawfully, knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 205

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, in the Eastern District of Virginia, JACQUELINE STANTON STEWART, a/k/a "Jackie," the defendant herein, did unlawfully, knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 206

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2004, in Richmond, Virginia, in the Eastern District of Virginia, SEAN DUNBAR QUARLES, a/k/a "Big Pun," the defendant herein, did unlawfully, knowingly and intentionally distribute approximately 28 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 207

THE GRAND JURY FURTHER CHARGES THAT:

In or about early 2000, at the parking lot of the Newport Square Shopping Center, in Newport News, Virginia, in the Eastern District of Virginia, ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E," the defendant herein, did unlawfully, knowingly and intentionally distribute approximately 20 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (D) and Title 18, United States Code, Section 2.)



COUNT 208

THE GRAND JURY FURTHER CHARGES THAT:

In or about March 2000, at the Radisson Hotel parking garage, in Hampton, Virginia, in the Eastern District of Virginia, ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E," the defendant herein, did unlawfully, knowingly and intentionally distribute approximately 10 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (D) and Title 18, United States Code, Section 2.)

COUNT 209

THE GRAND JURY FURTHER CHARGES THAT:

In or about the Summer of 2000, at Harpoon Larry's Oyster Bar, in Hampton, Virginia, in the Eastern District of Virginia, ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E," the defendant herein, did unlawfully, knowingly and intentionally distribute approximately 150 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 210

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2001, in Richmond, Virginia, in the Eastern District of Virginia, ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E," and ROBERT JAMES DUNN, JR a/k/a "Rob", the defendants herein, did unlawfully, knowingly and intentionally distribute approximately 80 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (D) and Title 18, United States Code, Section 2.)

COUNT 211

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 22, 2001, in Richmond, Virginia, in the Eastern District of Virginia, ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E," and ROBERT JAMES DUNN, JR a/k/a "Rob", the defendants herein, did unlawfully, knowingly and intentionally distribute approximately 80 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (D) and Title 18, United States Code, Section 2.)

COUNT 212

THE GRAND JURY FURTHER CHARGES THAT:

On or about summer of 2001, in Hampton, Virginia, in the Eastern District of Virginia, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" and CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendants herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 80 kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (A) (ii) and Title 18, United States Code, Section 2.)

COUNT 213

THE GRAND JURY FURTHER CHARGES THAT:

On or about March of 2002, at 2805 Build America Drive, in Hampton, Virginia, in the Eastern District of Virginia, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" and CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendants herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 30 kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (A) (ii) and Title 18, United States Code, Section 2.)

COUNT 214

THE GRAND JURY FURTHER CHARGES THAT:

On or about March of 2002, at 115 Windy Point Drive, in Suffolk, Virginia, in the Eastern District of Virginia, JAMES FRANK SMALLWOOD, a/k/a "Pops," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately ten (10) kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (A) (ii) and Title 18, United States Code, Section 2.)

COUNT 215

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 15, 2004, at the Radisson Hotel, in Hampton, Virginia, in the Eastern District of Virginia, ELOISA RIOS QUINONES, a/k/a "Eloisa Vickery," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 216

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 2, 2004, in Richmond, Virginia, in the Eastern District of Virginia, TILLMON LAMONT WOODSON, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately one (1) kilogram of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (B) (ii) and Title 18, United States Code, Section 2.)

COUNT 217

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 8, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, in the Eastern District of Virginia, SEAN DUNBAR QUARLES, a/k/a "Big Pun," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 218

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, in the Eastern District of Virginia, SEAN DUNBAR QUARLES, a/k/a "Big Pun," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 36 grams of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (B) (ii) and Title 18, United States Code, Section 2.)

COUNT 219

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 12, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, in the Eastern District of Virginia, SEAN DUNBAR QUARLES, a/k/a "Big Pun," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 36 grams of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 220

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2004, in Richmond, Virginia, in the Eastern District of Virginia, KIET VAN TROUNG, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 221

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 17, 2004, in Richmond, Virginia, in the Eastern District of Virginia, KIET VAN TROUNG, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 222

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 20, 2004, at Holly Springs Road and Hopkins Avenue, in Richmond, Virginia, in the Eastern District of Virginia, SEAN DUNBAR QUARLES, a/k/a "Big Pun," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 223

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 23, 2004, in Norfolk, Virginia, in the Eastern District of Virginia, LATARSHA LANELLE GORE, a/k/a "Pinki," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)



COUNT 224

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 26, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, in the Eastern District of Virginia, JARICE DEVON MASON, a/k/a "Ja Ri," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 225

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 28, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, JARICE DEVON MASON, a/k/a "Ja Ri," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 226

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 29, 2004, in Richmond, Virginia, in the Eastern District of Virginia, SEAN DUNBAR QUARLES, a/k/a "Big Pun," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 227

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 31, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, in the Eastern District of Virginia, JARICE DEVON MASON, a/k/a "Ja Ri," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 228

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 2, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, JARICE DEVON MASON, a/k/a "Ja Ri," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 229

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, in the Eastern District of Virginia, KIET VAN TROUNG, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 230

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, JARICE DEVON MASON, a/k/a "Ja Ri," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 231

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2004, in Norfolk, Virginia, in the Eastern District of Virginia, LATARSHA LANELLE GORE, a/k/a "Pinki," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 232

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 4, 2004, in Norfolk, Virginia, in the Eastern District of Virginia, LATARSHA LANELLE GORE, a/k/a "Pinki," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 233

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 10, 2004, at 3353 Meadowmont Lane, in Henrico County, Virginia, in the Eastern District of Virginia, JARICE DEVON MASON, a/k/a "Ja Ri," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 234

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 11, 2004, in Richmond, Virginia, in the Eastern District of Virginia, KIET VAN TROUNG, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 235

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 13, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, JARICE DEVON MASON, a/k/a "Ja Ri," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine base, commonly known as "crack", a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 236

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 16, 2004, at 5000 Burtwood Lane, in Richmond, Virginia, in the Eastern District of Virginia, SEAN DUNBAR QUARLES, a/k/a "Big Pun," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 237

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 26, 2004, at 3353 Meadowmont Lane, Virginia, in the Eastern District of Virginia, TILLMON LAMONT WOODSON, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately four (4) kilograms of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (B) (ii) and Title 18, United States Code, Section 2.)

COUNT 238

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 3, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, MARCUS EUGENE TAYLOR, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 239

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 10, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, MARCUS EUGENE TAYLOR, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)



COUNT 240

THE GRAND JURY FURTHER CHARGES THAT:

In or about late November 2003, at 1051 W. Ocean View Avenue, in Norfolk, Virginia, in the Eastern District of Virginia, CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 2000 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (B) and Title 18, United States Code, Section 2.)

COUNT 241

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 20, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, MARCUS EUGENE TAYLOR and ANGELA DENEEN CLARK, a/k/a "Angie," the defendants herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (D) and Title 18, United States Code, Section 2.)

COUNT 242

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 24, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," and MARCUS EUGENE TAYLOR, the defendants herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 200 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 243

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 14, 2004, at the Blue & Gray Self Storage, in Chesterfield County, Virginia, in the Eastern District of Virginia, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez," the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute approximately 200 pounds of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (C) and Title 18, United States Code, Section 2.)

COUNT 244

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2004, at 11201 Kingfisher Terrace, in Chesterfield County, Virginia, in the Eastern District of Virginia, KIET VAN TROUNG, the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (D) and Title 18, United States Code, Section 2.)

COUNT 245

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 3, 2004, at 502 Marshall Street, in Hampton, Virginia, in the Eastern District of Virginia, MARCUS EUGENE TAYLOR the defendant herein, did unlawfully, knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance.

(In violation of Title 21, United States Code, Sections 841 (a) (1) and (b) (1) (D) and Title 18, United States Code, Section 2.)

COUNT 246

THE GRAND JURY FURTHER CHARGES THAT:

From on or about November 16, 2000, and continuously thereafter up to and including December 2003, the exact date being unknown to the Grand Jury, within the Eastern District of Virginia, CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendant herein, did knowingly and intentionally manage and control, as lessee, a building at 2805 Build America Drive, unit #34, in Hampton, Virginia, for the purpose of unlawfully storing and distributing marijuana, a Schedule I controlled substance and cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 856 (a) (2) and Title 18, United States Code, Section 2.)

COUNT 247

THE GRAND JURY FURTHER CHARGES THAT:

From on or about March 22, 2002, the exact date being unknown to the Grand Jury, and continuously thereafter up to and including May 12, 2004, within the Eastern District of Virginia, JACQUELINE STANTON STEWART, a/k/a "Jackie," the defendant herein, did knowingly and intentionally manage and control a building at 3353 Meadowmont Drive, Henrico County, Virginia, as owner and mortgagee, for the purpose of unlawfully storing, distributing, and using marijuana, a Schedule I controlled substance, and cocaine, a Schedule II narcotic controlled substance.

(In violation of Title 21, United States Code, Section 856 (a) (2) and Title 18, United States Code, Section 2.)

COUNT 248

THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 1, 2003, the exact date being unknown to the Grand Jury, and continuously thereafter up to and including May 12, 2004, within the Eastern District of Virginia, MARCUS EUGENE TAYLOR and ANGELA DENEEN CLARK a/k/a "Angie," the defendants herein, did knowingly and intentionally maintain a place at 502 Marshall Street, Hampton, Virginia, for the purpose of unlawfully manufacturing, distributing, and using marijuana, a Schedule I controlled substance, cocaine and cocaine base, commonly known as "crack", both of which are Schedule II narcotic controlled substances.

(In violation of Title 21, United States Code, Section 856 (a) (1) and Title 18, United States Code, Section 2.)

COUNT 249

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 25, 2004, at Blue and Gray Storage, in Chesterfield County, Virginia, in the Eastern District of Virginia, CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendant herein, did unlawfully and knowingly possess a Glock pistol, Model 26, serial number BTP171, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute marijuana and cocaine, in violation of Title 21, United States Code, Section 846, as charged in Count One of this indictment.

(In violation of Title 18, United States Code, Section 924 (c) (1) and Title 18, United States Code, Section 2.)

COUNT 250

THE GRAND JURY FURTHER CHARGES THAT:

On or about summer of 2003, at 646 W. Ocean View Avenue, Norfolk, Virginia, in the Eastern District of Virginia, CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy," the defendant herein, having been previously convicted of a felony crime punishable by imprisonment for a term exceeding one year, did unlawfully and knowingly possess, in and affecting commerce, firearms, that is; an Essex Arms, .45 caliber pistol, serial number 54903; a Fabrique Nationale, 9mm pistol, serial number Z1078, and a Ruger, .22 caliber pistol/rifle, serial number 11208303, which had been shipped and transported in interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922 (g) (1) and Title 18, United States Code, Section 2.)



COUNTS 251 - 324

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates and in the locations set forth below, in the Eastern District of Virginia, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" (hereinafter referred to as JOE RODRIGUEZ); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); ANGELA DENEEN CLARK, a/k/a "Angie" (hereinafter referred to as ANGELA CLARK); LATARSHA LANELLE GORE, a/k/a "Pinki" (hereinafter referred to as LATARSHA GORE); BRIAN ONEIL MASON, a/k/a "Smurf" (hereinafter referred to as BRIAN MASON); JARICE DEVON MASON, a/k/a "Ja Ri" (hereinafter referred to as JARICE MASON); JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE); SEAN DUNBAR QUARLES, a/k/a "Big Pun" (hereinafter referred to as SEAN QUARLES); JAMES FRANK SMALLWOOD, a/k/a "Pops" (hereinafter referred to as JAMES SMALLWOOD); JACQUELINE STANTON STEWART, a/k/a "Jackie" (hereinafter referred to as JACQUELINE STEWART); MARCUS EUGENE TAYLOR (hereinafter referred to as MARCUS TAYLOR); KIET VAN TROUNG (hereinafter referred to as KIET TRUONG); and TILLMON LAMONT WOODSON, the defendants herein, knowingly and intentionally used a communication facility, cellular telephones bearing the following mobile identification numbers subscribed in the following names, in committing, causing and facilitating the commission of a violations of Title 21, United States Code, Sections 841(a) (1) and 846, that is, possession with intent to distribute and distribution of marijuana, a Schedule I controlled substance and cocaine and cocaine base, commonly known as "crack", Schedule II narcotic controlled substances and conspiracy to possess with intent to distribute and distribution of

marijuana, a Schedule I controlled substance and cocaine and cocaine base, commonly known as “crack”, both of which are Schedule II narcotic controlled substances.

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANTS</u>	<u>LOCATION</u>	<u>NUMBER SUBSCRIBER</u>
251	03/04/04	SEAN QUARLES	Richmond, VA	(804) 304-7395 Aaron Burton
252	03/05/04	CHARLES VICKERY	Richmond, VA	(804) 304-7395 Aaron Burton
253	03/07/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton
254	03/08/04	TILLMON WOODSON	Richmond, VA	(804) 304-7395 Aaron Burton
255	03/09/04	SEAN QUARLES	Richmond, VA	(804) 304-7395 Aaron Burton
256	03/09/04	JOE RODRIGUEZ	Henrico County, VA	(804) 304-7395 Aaron Burton
257	03/10/04	JOE RODRIGUEZ	Chesterfield County, VA	(804) 304-7395 Aaron Burton
258	03/11/04	SEAN QUARLES	Richmond, VA	(804) 304-7395 Aaron Burton
259	03/11/04	JOE RODRIGUEZ	Hampton, VA	(804) 304-7395 Aaron Burton
260	03/14/04	JOE RODRIGUEZ	Richmond, VA	(804) 304-7395 Aaron Burton
261	03/14/04	JACQUELINE STEWART	Richmond, VA	(804) 304-7395 Aaron Burton
262	03/14/04	SEAN QUARLES	Richmond, VA	(804) 304-7395 Aaron Burton
263	03/15/04	JOE RODRIGUEZ	Henrico County, VA	(804) 304-7395 Aaron

				Burton
264	03/16/04	CHARLES VICKERY	Chesterfield County, VA	(804) 304-7395 Aaron Burton
265	03/16/04	TILLMON WOODSON	Richmond, Virginia	(804) 304-7395 Aaron Burton
266	03/17/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton
267	03/17/04	JACQUELINE STEWART	Henrico County, VA	(804) 304-7395 Aaron Burton
268	03/17/04	SEAN QUARLES	Richmond, VA	(804) 304-7395 Aaron Burton
269	03/18/04	JOE RODRIGUEZ	Richmond, VA	(804) 304-7395 Aaron Burton
270	03/23/04	SEAN QUARLES	Richmond, VA	(804) 304-7395 Aaron Burton
271	03/23/04	BRIAN MASON	Norfolk, VA	(757) 580-0978 Aaron Burton
272	03/23/04	CHARLES VICKERY	Newport News, VA	(804) 304-7395 Aaron Burton
273	03/24/04	JAMES SMALLWOOD	Henrico County, VA	(757) 580-0978 Aaron Burton
274	03/24/04	LATARSHA GORE	Portsmouth, VA	(757) 580-0978 Aaron Burton
275	03/25/04	BRIAN MASON	Norfolk, VA	(757) 580-0978 Aaron Burton
276	03/25/04	JAMES SMALLWOOD	Henrico County, VA	(757) 580-0978 Aaron Burton
277	03/25/04	JARICE MASON	Virginia Beach, VA	(757) 580-0978 Aaron Burton
278	03/26/04	BRIAN MASON	Henrico County, VA	(757) 580-0978 Aaron Burton

279	03/26/04	SEAN QUARLES	Richmond, VA	(804) 304-7395 Aaron Burton
280	03/27/04	JACQUELINE STEWART	Henrico County, VA	(804) 304-7395 Aaron Burton
281	03/27/04	ANGELA CLARK	Richmond, VA	(757) 580-0978 Aaron Burton
282	03/27/04	CHARLES VICKERY	Richmond, VA	(804) 304-7395 Aaron Burton
283	03/27/04	BRIAN MASON	Norfolk, VA	(757) 580-0978 Aaron Burton
284	03/29/04	JAMES SMALLWOOD	Richmond, VA	(757) 580-0978 Aaron Burton
285	03/29/04	TILLMON WOODSON	Richmond, VA	(804) 304-7395 Aaron Burton
286	03/31/04	LATARSHA GORE	Portsmouth, VA	(757) 580-0978 Aaron Burton
287	04/01/04	JARICE MASON	Virginia Beach, VA	(757) 580-0978 Aaron Burton
288	04/01/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton
289	04/01/04	CHARLES VICKERY	Henrico County, VA	(804) 304-7395 Aaron Burton
290	04/03/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton
291	04/03/04	LATARSHA GORE	Portsmouth, VA	(757) 580-0978 Aaron Burton
292	04/03/04	JARICE MASON	Virginia Beach, VA	(757) 580-0978 Aaron Burton
293	04/05/04	LATARSHA GORE	Portsmouth, VA	(757) 580-0978 Aaron Burton
294	04/05/04	TILLMON WOODSON	Richmond, VA	(804) 304-

				7395 Aaron Burton
295	04/06/04	CHARLES VICKERY	Chesterfield County, VA	(804) 304- 7395 Aaron Burton
296	04/07/04	TILLMON WOODSON	Richmond, VA	(804) 304- 7395 Aaron Burton
297	04/07/04	SEAN QUARLES	Richmond, VA	(804) 304- 7395 Aaron Burton
298	04/08/04	JARICE MASON	Virginia Beach, VA	(757) 580- 0978 Aaron Burton
299	04/08/04	LATARSHA GORE	Portsmouth, VA	(757) 580- 0978 Aaron Burton
300	04/10/04	CHARLES VICKERY	Chesterfield County, VA	(804) 304- 7395 Aaron Burton
301	04/10/04	KIET TROUNG	Richmond, VA	(804) 304- 7395 Aaron Burton
302	04/11/04	KIET TROUNG	Richmond, VA	(804) 304- 7395 Aaron Burton
303	04/12/04	TILLMON WOODSON	Richmond, VA	(804) 304- 7395 Aaron Burton
304	04/12/04	JARICE MASON	Virginia Beach, VA	(757) 580- 0978 Aaron Burton
305	04/13/04	JOHN MCBRIDE	Chesapeake, VA	(757) 580- 0978 Aaron Burton
306	04/13/04	JARICE MASON	Virginia Beach, VA	(757) 580- 0978 Aaron Burton
307	04/22/04	KIET TROUNG	Richmond, VA	(804) 304- 7395 Aaron Burton
308	04/22/04	TILLMON WOODSON	Richmond, VA	(804) 304- 7395 Aaron Burton
309	04/25/04	SEAN QUARLES	Richmond, VA	(804) 304- 7395 Aaron

				Burton
310	04/26/04	JACQUELINE STEWART	Chesterfield County, VA	(804) 304-7395 Aaron Burton
311	04/28/04	TILLMON WOODSON	Richmond, VA	(804) 304-7395 Aaron Burton
312	04/29/04	JARICE MASON	Virginia Beach, VA	(804) 304-7395 Aaron Burton
313	04/30/04	JARICE MASON	Virginia Beach, VA	(804) 304-7395 Aaron Burton
314	05/03/04	JARICE MASON	Virginia Beach, VA	(804) 304-7395 Aaron Burton
315	05/03/04	MARCUS TAYLOR	Richmond, VA	(804) 304-7395 Aaron Burton
316	05/04/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton
317	05/06/04	JARICE MASON	Virginia Beach, VA	(804) 304-7395 Aaron Burton
318	05/07/04	MARCUS TAYLOR	Richmond, VA	(804) 304-7395 Aaron Burton
319	05/08/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton
320	05/09/04	ANGELA CLARK	Richmond, VA	(804) 304-7395 Aaron Burton
321	05/10/04	MARCUS TAYLOR	Hampton, VA	(804) 304-7395 Aaron Burton
322	05/10/04	ANGELA CLARK	Richmond, VA	(804) 304-7395 Aaron Burton
323	05/10/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton
324	05/12/04	KIET TROUNG	Richmond, VA	(804) 304-7395 Aaron Burton

(In violation of Title 21, United States Code, Section 843 (b) and Title 18, United States Code, Section 2.)

## CRIMINAL FORFEITURE

A. The defendants herein, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" (hereinafter referred to as JOE RODRIGUEZ); TERENCE LAMAR JOHNSON, a/k/a "Ronald Stroud," a/k/a "Kendoo" (hereinafter referred to as TERENCE JOHNSON); ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E" (hereinafter referred to as ERIK MILLER); CHARLES MCDONALD VICKERY, a/k/a "Charlie," a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); LISA LYNN BAIRD (hereinafter referred to as LISA BAIRD); ROGER BENT, a/k/a "Jason Knight," a/k/a "Bigs" (hereinafter referred to as ROGER BENT); JESUS CEBALLOS, a/k/a "Chuy" (hereinafter referred to as JESUS CEBALLOS); ANGELA DENEEN CLARK, a/k/a "Angie" (hereinafter referred to as ANGELA CLARK); ROBERT JAMES DUNN, JR., a/k/a "Rob" (hereinafter referred to as ROBERT DUNN, JR.); LATARSHA LANELLE GORE, a/k/a "Pinki" (hereinafter referred to as LATARSHA GORE); RICHARD BRYAN LESTER, a/k/a "Mark Shepard," a/k/a "Kentucky" (hereinafter referred to as RICHARD LESTER); RICARDO OSCAR MANCHA, a/k/a "Rick" (hereinafter referred to as RICARDO MANCHA); BRIAN ONEIL MASON, a/k/a "Smurf" (hereinafter referred to as BRIAN MASON); JARICE DEVON MASON, a/k/a "Ja Ri" (hereinafter referred to as JARICE MASON); JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE); SEAN DUNBAR QUARLES, a/k/a "Big Pun" (hereinafter referred to as SEAN QUARLES); ELOISA RIOS QUINONES, a/k/a "Eloisa Vickery" (hereinafter referred to as ELOISA QUINONES); LAZARO ALVARDO RAMIREZ, JR., a/k/a "Agullero," a/k/a "Oscar" (hereinafter referred to as LAZARO RAMIREZ, JR.); JAMES FRANK SMALLWOOD, a/k/a "Pops" (hereinafter referred to as JAMES SMALLWOOD); JACQUELINE STANTON STEWART, a/k/a "Jackie" (hereinafter referred to as



(JACQUELINE STEWART); MARCUS EUGENE TAYLOR (hereinafter referred to as MARCUS TAYLOR); KIET VAN TROUNG (hereinafter referred to as KIET TROUNG); CHARLES MCDONALD VICKERY II, a/k/a "Chico" (hereinafter referred to as CHARLES VICKERY, II); and TILLMON LAMONT WOODSON, if convicted of Counts One, Two, Three, 203-249, namely, Conspiracy to Distribute and Possess with Intent to Distribute Marijuana, Cocaine and Cocaine Base, commonly known as "crack"; Operating a Continuing Criminal Enterprise; Conspiracy to Import Marijuana and Cocaine; Distribution of Marijuana, Cocaine and Cocaine Base, commonly known as "crack"; Possession with Intent to Distribute Marijuana, Cocaine and Cocaine Base, commonly known as "crack" and Maintaining and Managing a Building for Distributing Marijuana, Cocaine and Cocaine Base, commonly known as "crack", shall forfeit to the United States:

1. Any and all property constituting, or derived from, any proceeds the defendant obtained, directly or indirectly, as the result of such violations;
2. Any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violations; and,
3. Any interest in, claims against, and property or contractual rights affording a source of control over, the continuing criminal enterprise.

(All in violation of Title 21, United States Code, Section 853 (a).)

B. The defendants herein, JOE AGAPETO RODRIGUEZ, a/k/a "Ricardo Prendez Gonzalez" (hereinafter referred to as JOE RODRIGUEZ); TERENCE LAMAR JOHNSON, a/k/a "Ronald Stroud," a/k/a "Kendoo" (hereinafter referred to as TERENCE JOHNSON); ERIK LEROY MILLER, a/k/a "Dave A. Johnson," a/k/a "David Jackson," a/k/a "Hootie," a/k/a "E" (hereinafter referred to ERIK MILLER); CHARLES MCDONALD VICKERY, a/k/a "Charlie,"

a/k/a "Big Daddy" (hereinafter referred to as CHARLES VICKERY); LISA LYNN BAIRD (hereinafter referred to as LISA BAIRD); ROGER BENT, a/k/a "Jason Knight," a/k/a "Bigs" (hereinafter referred to as ROGER BENT); ROBERT MACK DARR, a/k/a "Bobby" (hereinafter referred to as ROBERT DARR); ROBERT JAMES DUNN, JR., a/k/a "Rob" (hereinafter referred to as ROBERT DUNN, JR.); GLORIA LYNN GREEN (hereinafter referred to as GLORIA GREEN); PAMELA YVETTE HOFFLER-RIDDICK (hereinafter referred to as PAMELA HOFFLER-RIDDICK); LAMONIKA S. LAWRENCE (hereinafter referred to as LAMONIKA LAWRENCE); RICHARD BRYAN LESTER, a/k/a "Mark Shepard," a/k/a "Kentucky" (hereinafter referred to as RICHARD LESTER); RICARDO OSCAR MANCHA, a/k/a "Rick" (hereinafter referred to as RICARDO MANCHA); JOHN CECIL MCBRIDE (hereinafter referred to as JOHN MCBRIDE); PABLO MAS OQUENDO; ELOISA RIOS QUINONES, a/k/a "Eloisa Vickery" (hereinafter referred to as ELOISA QUINONES); LAZARO ALVARDO RAMIREZ, JR., a/k/a "Agullero," a/k/a "Oscar" (hereinafter referred to as LAZARO RAMIREZ, JR.); JAMES FRANK SMALLWOOD, a/k/a "Pops" (hereinafter referred to as JAMES SMALLWOOD); DOROTHY JOHNSON SMITH (hereinafter referred to as DOROTHY SMITH); FRED A MARIE SMITH (hereinafter referred to as FRED A SMITH); JACQUELINE STANTON STEWART, a/k/a "Jackie" (hereinafter referred to as JACQUELINE STEWART); and CHARLES MCDONALD VICKERY II, a/k/a "Chico" (hereinafter referred to as CHARLES VICKERY, II), if convicted of Counts Four, Five, 196-201, namely, Conspiracy to Launder Money, Money Laundering and Structuring a Financial Transaction:

1. Any and all property, real or personal, involved in such offense; and

2. Any and all property traceable to such property, in whole or in part, in such offense.

(All in violation of Title 18, United States Code, Section 982 (a)(1).)

C. The property subject to forfeiture under paragraphs A and B includes but is not limited to the following:

1. A monetary judgment equaling the sum of not less than \$20,350,000 in the aggregate, which represents the gross proceeds realized from the aforementioned offenses by the defendants;

2. Real property known as 12823 Carvel Lane, Houston, Texas;
3. Real property known as 115 Windy Point Drive, Suffolk, Virginia;
4. Real property known as 8206 Bonner Drive, Houston, Texas;
5. Real property known as 3353 Meadowmont Lane, Henrico County, Virginia;
6. Real property known as 7505-9E River Road, Newport News, Virginia;
7. Real property known as 4709 Septaria Quay, Chesapeake, Virginia;
9. Vehicle known as 2001 Lincoln Town Car VIN: 1LNHM82WX1Y632736;
10. Vehicle known as 2002 Dodge R3500 pickup truck VIN: 3B7MF33662M257083;
11. Vehicle known as 2003 BMW 745L VIN: WBAGN63493DR08281;
12. Vehicle known as 2002 Chevrolet Corvette VIN: 1G1YY32G525124514;
13. Vehicle known as 2001 Jeep Cherokee VIN: 1J4GX48SX1C594260;
14. Vehicle known as 2003 Lincoln Town Car VIN: 1LNHM87A63Y671307;
15. Vehicle known as Ford Econoline van (VIN: 1FTSS34F63HB69352);
16. Blackberry seized from JOHN MCBRIDE; and
17. Computer seized from JOHN MCBRIDE

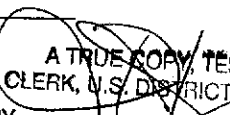
D. If any of the property subject to forfeiture above, (a) cannot be located upon the exercise of due diligence, (b) has been transferred to, sold to, or deposited with a third person, (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be subdivided without difficulty; it is the intent of the United States to seek forfeiture of any other property of the defendants, up to the value described above, as subject to forfeiture under Title 21, United States Code, Section 853 (p) and Title 18, United States Code, Section 982 (b) (2).

## SENTENCING ALLEGATIONS

1. The defendant, CHARLES MCDONALD VICKERY, possessed firearms in the summer of 2003, January 25, 2004 and March 24, 2004; pursuant to United States Sentencing Commission, Guidelines Manual, §2D1.1.
2. The defendants, JOE AGAPETO RODRIGUEZ, TERENCE LAMAR JOHNSON, ERIK LEROY MILLER and CHARLES MCDONALD VICKERY, operated a continuing criminal enterprise; pursuant to United States Sentencing Commission, Guidelines Manual, §2D1.5.
3. The defendants, JOE AGAPETO RODRIGUEZ, TERENCE LAMAR JOHNSON, ERIK LEROY MILLER, CHARLES MCDONALD VICKERY, RICARDO OSCAR MANCHA and JOHN CECIL MCBRIDE were organizers, leaders, managers or supervisors of a criminal activity that involved involving five or more participants; pursuant to United States Sentencing Commission, Guidelines Manual, §3B1.1.
4. The defendants, JOHN CECIL MCBRIDE and GLORIA LYNN GREEN, abused their position of public or private trust; pursuant to United States Sentencing Commission, Guidelines Manual, §3B1.3.

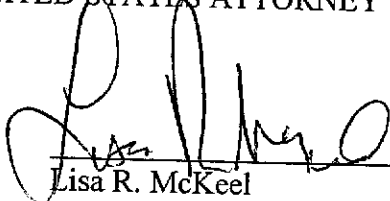
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CLERK, U.S. DISTRICT COURT  
BY   
DEPUTY CLERK

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